Final Independent Project Evaluation of the

"Support to Anti-Corruption in Nigeria"
Project

NGAX60
Nigeria

December 2017

This evaluation report was prepared by an evaluation team consisting of Mr. Pierre Robert (team leader), Mr. Kelechi Chijioke Iwuamadi and Dr Fatima Waziri-Azi (substantive experts). The Independent Evaluation Unit (IEU) of the United Nations Office on Drugs and Crime (UNODC) provides normative tools, guidelines and templates to be used in the evaluation process of projects. Please find the respective tools on the IEU web site: http://www.unodc.org/unodc/en/evaluation/evaluation.html

The Independent Evaluation Unit of the United Nations Office on Drugs and Crime can be contacted at:

Disclaimer

Independent Project Evaluations are scheduled and managed by the project managers and conducted by external independent evaluators. The role of the Independent Evaluation Unit (IEU) in relation to independent project evaluations is one of quality assurance and support throughout the evaluation process, but IEU does not directly participate in or undertake independent project evaluations. It is, however, the responsibility of IEU to respond to the commitment of the United Nations Evaluation Group (UNEG) in professionalizing the evaluation function and promoting a culture of evaluation within UNODC for the purposes of accountability and continuous learning and improvement.

Acknowledgements

The views expressed in this report are those of the authors. They do not represent those of UNODC or of any of the institutions referred to in the report. All errors and omissions remain the responsibility of the authors.

CONTENTS

ABBREVIATIONS AND ACRONYMS

ACA	Anti-Corruption Agency
ANEEJ	Africa Network for Environment and Economic Justice
APC	All Progressives Congress
BPP	Bureau of Public Procurement
BPSR	Bureau of Public Service Reform
CASAN	Civil Society Advocacy to Support Anti-corruption in Nigeria
CCB	Code of Conduct Bureau
CCT	Code of Conduct Tribunal
CONIG	UNODC Country Office in Nigeria
CSO	Civil Society Organisation
DEVCO	Development Cooperation Directorate-General
DPR	Department of Petroleum Regulation
EDF (FED)	European Development Fund (*Fonds européen de développement*)
EEAS	European External Action Service
EFCC	Economic and Financial Crimes Commission
EUD	European Union Delegation
FCT	Federal Capital Territory
FGN	Federal Government of Nigeria
FHC	Federal High Court
FRMS	Financial Resources Management Service
goaML	Government Office Money Laundering (software)
goCASE	Government Office Case Management (software)
goINTEL	Government Office Intelligence Management (software)
HRMS	Human Resources Management Service
IATT	Inter-Agency Task Team
ICPC	Independent Corrupt Practices (and other Related Offenses) Commission
IEU	Independent Evaluation Unit, UNODC
IT	Information Technology
MBNP	Ministry of Budget and National Planning
MoU	Memorandum of Understanding
MTE	Mid-Term Evaluation
NACS	National Anti-Corruption Strategy
NBS	Nigerian Bureau of Statistics
NEITI	Nigerian Extractive Industries Transparency Initiative
NFIU	Nigerian Financial Intelligence Unit
NGO	Non-governmental organisation
NHRC	Nigerian Human Rights Commission
NIGAWD	New Generation Girls and Women Development Initiative
NNPC	Nigeria National Petroleum Corporation
NOA	National Orientation Agency
OECD	Organisation for Economic Cooperation and Development
OGP	Open Government Partnership
PACAC	Presidential Advisory Committee against Corruption
PCC	Public Complaints Commission
PMC	Project Management Committee
PST	Project Support Team
RSAME	Regional Section for Africa and the Middle East
SCUML	Special Control Unit on Money Laundering
SLA	Service-Level Agreement
TOR	Terms of Reference

ToT	Training of Trainers
TUGAR	Technical Unit on Governance and Anti-Corruption Reform
UNCAC	United Nations Convention against Corruption
UNEG	United Nations Evaluation Group
UNDAF	United Nations Development Assistance Framework
UNDP	United Nations Development Programme
UNODC	United Nations Office on Drugs and Crime

EXECUTIVE SUMMARY

Background of the project
This is the report of the final Independent Project Evaluation of the project "Support to Anti-Corruption in Nigeria" (NGAX60), implemented by the United Nations Office on Drugs and Crime (UNODC) through its Country Office in Nigeria (CONIG), based in Abuja, Nigeria from November 2012 (project activities stated in 2013) till August 2017, with the collaboration of the United Nations Development Program (UNDP) for the implementation of the Civil Society component of the project. With an original budget of €34m, reduced in 2015, the project's disbursed budget as at end-March 2017 was US$14,146,808, out of a total approved budget – fully pledged, supported by the European Union Delegation (EUD) in Nigeria – of US$18,533,863.

The evaluation
The summative final evaluation was undertaken by a team of three independent external evaluators, i.e. a team leader and two substantive experts.[1] The methodology of the evaluation was to assess each component of the project against the evaluation OECD DAC (The Organisation for Economic Co-operation and Development - Development Assistance Committee) criteria: relevance, efficiency, effectiveness, impact and sustainability, as well as partnerships and cooperation and human rights and gender mainstreaming of the project implementation, while also identifying common patterns across all three components. In addition, the evaluation assessed the implementation of the recommendations of the EU mid-term evaluation (MTE) in 2015. The purpose of the final evaluation was further to derive lessons learned, best practice and recommendations to inform future decision-making and organizational learning. A mixed-method approach was used, combining document analysis, semi-structured interviews and focus group meetings with a broad range of project stakeholders. Furthermore, the evaluation implemented and followed an inclusive and gender-sensitive methodology.

The evaluation methodology considered the collection and analysis of both quantitative and qualitative data/information through triangulation of sources and methods, including interviews with beneficiaries, project staff and consultants, focal points, and other key informants and the use of various collection methods (e.g. documents review, interviews, survey/s, and validation meetings).

Design
The project was based on an analysis of the impact of corruption on Nigeria's society and economy, carried out by CONIG in consultation with the EU, in 2011. It also took into account Nigeria's signature of the United Nations Convention against Corruption (UNCAC) and the existence of a range of Anti-Corruption Agencies (ACAs), and noted the possible adoption of a National Anti-Corruption Strategy (NACS). Project documentation indicates that the EU commissioned consultants to carry out the identification and formulation of the project, which was subsequently

---

[1] One of the two substantive experts, a Barrister and legal academic, had been seconded in 2016 and 2017 to the Presidential Advisory Commission against Corruption (PACAC), which was one of the ACAs involved in the project. The potential conflict of interest related to this situation was addressed by the evaluation team in that assessment of the work done with PACAC was led by the international consultant.

designed by the CONIG team that had implemented the anti-corruption project previously funded under the 9th European Development Fund (EDF). It was further developed in collaboration with national stakeholders. Interviews with partners and beneficiaries of the project indicated that, in their perception, they were not sufficiently involved in detailed design-stage discussions (though they were consulted at key stages of implementation). The evaluation however shows that the design of the project was over-optimistic about the adoption of a NACS, as well as with a highly ambitious agenda of activities – which eventually proved unrealistic in view of available human resources and other management issues, and in view of the changing political context of the country at the outset of the project.

Relevance
Analysis of project documentation and interviews with a broad range of stakeholders demonstrated that the project was very relevant, in that it identified substantial needs in Nigeria in relation to the fight against corruption and addressed those in ways that were fully in line with UNCAC, and were broadly consistent with the policies and programming approaches of CONIG and the EU.

Contributing to the relevance of the project was further its timeliness. The project came at a time of lean budgetary conditions and dwindling revenue in Nigeria, as well as nationwide economic difficulties,. This means that the government, at the time, was not in a position to prioritise additional budgets for the ACAs. The project therefore contributed to a degree of continuity in the ACAs' institutional development. Beyond the state actors' beneficiaries, the project strategy took into account the organisational development, legal environment and capacity of Civil Society Organisations (CSOs).

Efficiency
The project was efficient in terms of the relationship between mobilised human and financial resources and the amount and quality of outputs produced and results achieved. The project's outputs were of a high standard, as was the level of expertise and technical assistance provided in various forms: from project team members at CONIG to Vienna-based staff at the Regional Section for Africa and the Middle East (RSAME) and outside experts, mentors and trainers.

Nevertheless, the efficiency of the project was marred by substantial organisational, administrative and management problems, which together led to substantial delays in the implementation of activities. Procedural issues led to the cancellation or scaling back of activities – particularly in relation to the provision of IT support to the ACAs – which had a substantial impact on the achievement of project objectives and amounted to a regrettable missed opportunity.

The key area of weakness in terms of efficiency has been with project management at CONIG and UNODC Headquarters. The difficulties encountered with project management were not related to the skills, competence or commitment of individual staff members or managers. Nevertheless, systemic difficulties substantially hampered the efficient and effective implementation of the project. These included insufficient vetting of the original project proposal: interviews with various stakeholders showed that, while Headquarters staff and managers were consulted on various aspects of the project design, there was no specific inter-divisional process for senior level "sign off" on the overall project proposal. In addition, the project team at CONIG was too small to implement the project successfully, and initially lacked the necessary project management experience. The project team received substantial support in a range of areas, including procurement, financial planning and reporting to the EU - however Headquarters took too long to take remedial action concerning

delays in implementation of activities. A final factor was that the project team, and its manager, reported to the UNODC Country Representative at CONIG, who reported to the Regional Section for Africa and the Middle East (RSAME) at Headquarters and ultimately to the Director, Division for Operations. In practice, this meant that the project did not necessarily receive the timely senior management monitoring attention that its size and political implications necessitated.

Partnerships and cooperation

The project's partnership and cooperation arrangements were relevant and effective, in the sense that they helped ensure that the project performed well under each of the evaluation criteria and that they helped enhance its overall impact. While formal agreements (referred to as "compacts") between CONIG and ACAs will lapse at the end of the project, it is likely that the partnership and cooperation with them will continue, in a different form, beyond the project period.

Effectiveness

The project, as revised after the MTE in 2015, was effective in the sense that many of the activities, and of the results, included in the revised plan, were achieved. The project activities were implemented mainly at the federal level but included stakeholders from across the country. Nevertheless, delays in the achievement of some results hampered the effectiveness of the project with regard to some ACAs.

The project developed a visibility strategy in consultation with the EU Delegation. All activities implemented included visibility components. A communication strategy was also developed, with the aim of raising public awareness of various aspects of the fight against corruption, mentioning the EU's financial support for the project.

Impact

It is somewhat premature to refer to the impact of the project as a whole, partly because impact may appear some time after a project's end, and partly because many activities were concentrated in the final two years of the project and only completed at the time of the evaluation. Nevertheless, the evaluators were able to identify *elements of impact*, patterns or attitude changes that may possibly influence future anti-corruption activities in Nigeria.

The evaluation shows that the project is likely to achieve some positive impact in terms of institutional and CSO capacity to fight corruption, and in terms of staff skills and competences. Also, the project is likely to contribute to a continued change in attitudes, away from a sense of fatalism about corruption being inavoidable and towards specific actions being taken at all levels to prevent and fight corruption. The evaluators did not identify negative or unintended impacts, except to some extent in relation to unfulfilled expectations, on the part of ACAs, in relation to support for the development of IT systems.

Sustainability

The project had substantial elements of sustainability, in the sense that skills, organisational principles and processes were developed or improved, which helped ensure continued improvement in the fight against corruption. The sustainability strategy under the project was based on the principles of ownership in line with the Paris Declaration on Aid Effectiveness. Therefore, under the project design, provision was made for the project to assist beneficiary agencies with the development of their own strategy or development plans as a first step in the support to them.

One substantial contributor to sustainability was the mentorship approach, largely developed as a follow-up to the MTE. The main feature of the approach was that an outside expert, the mentor, was available full-time for a period of sixty days, to assess a particular ACA's situation and address its identified need in a particular area of specialisation – organisational development or thematic

issue such as corruption prevention. The mentees that benefitted from the project and met with evaluators were invariably enthusiastic about the result of the approach, and had clearly been highly committed throughout their training. They showed enthusiasm to follow up the recommendations from research on anti-corruption using the IATT platform.

Human rights
The evaluation shows that the project contributed to the promotion and protection of human rights by helping to reinforce due process in all aspects of the prevention and prosecution of corruption, building the capacity of ACAs to contribute to the transparency and accountability of government institutions and to the operation of an independent judiciary consistent with international human rights standards; and by building the capacity of CSOs to address corruption, contributed to enhancing citizens' involvement in the fight against corruption and in the process of keeping government accountable.

Gender
Project documents and interviews with stakeholders demonstrated that the project took gender equality considerations into account, in its design and implementation. It did so in particular through numerous training activities systematically involving women as participants, as shown in activity reports, and through the Household Survey, which systematically included gender disaggregated data. In addition, several of the CSO projects supported under Component 3 of the project were implemented by women-led organisations.

Innovation
The project introduced a number of innovations, in the form of policy and legislative changes, and in the form of processes and systems to address various aspects of corruption. These included legal innovation: the project worked with the Attorney General of the Federation and with the Federal High Court to devise an innovative process to address a legal loophole used by people whose extradition was sought by Nigeria. The project also included process and administrative innovations: the development of an anti-corruption data template for ACAs, which can also be used in tracking the implementation of the NACS, was described by ACAs as a useful innovation, encouraged by the project team. The Household Survey was the first survey of its kind in terms of scope and scale, providing a baseline measure of the extent of corruption as experienced by ordinary citizens.

Recommendations
Follow up to the project
CONIG should seek to continue providing input and technical advice to ACAs in Nigeria, prioritising areas where UNODC has unique expertise and skills, or where long-term UNODC input is appropriate. These areas include in particular the UNCAC review process; research and statistics; legislation and regulation; and the provision of intelligence software, coupled with training on its use and maintenance.

CONIG should also continue to support CSOs' work against corruption, through training and advice, and through encouragement of networking between CSOs and ACAs.

CONIG should collaborate with MBNP to develop an exit strategy for the project, ensuring that ACAs and CSOs continue to build on the benefits of the project in terms of capacity and training.

Need to enhance linkages between ACA and CSO support

CONIG should ensure that future projects in Nigeria should integrate work with CSOs and with ACAs. UNODC's expertise is relevant to both sets of stakeholders, and UNODC should in future encourage ACA and CSO collaboration in areas such as prevention, whistleblower protection, budget monitoring and public awareness raising.

CONIG should also consider the development of a communication and public advocacy strategy in the context of support to the implementation of the NACS.

CONIG should seek MBNP support to report on project progress to senior political leadership, encouraging involvement of political leaders in selected project activities.

Prioritisation of Training of Trainers
Future projects should emphasize a Training of Trainers approach. It is important for UNODC teams and managers involved in the design of future projects to reflect on the best ways to achieve critical mass for the acquisition of new skills. They should consider the option of using a ToT approach more systematically, or to work directly with judicial training institutions, with a view to entrenching the acquisition of new skills by ACA staff. The Corruption and Economic Crime Branch of UNODC Headquarters should also be consulted at the project design stage.

Response to donor requirements in project design
The UNODC senior management – including but not limited to CONIG and RSAME – should ensure that future UNODC projects intended for EU funding are fully in line with EU project cycle management requirements, including in relation to budget presentation and staffing levels. They should include detailed work plans, agreed with the relevant ACAs. Staff seniority and numbers should be consistent with the anticipated scope of activities and budget, and the eligibility of expenses such as IT services should be firmly agreed at the outset. UNODC should also ensure that future project designs include a thorough political and social risk analysis, as well as risk mitigation strategies. At UNODC Headquarters, the Division for Management and the Co-financing and Partnerships Section (including the UNODC Liaison Office in Brussels) should also be consulted on this aspect.

Senior management support for future projects
Project teams and managers of future projects should have access to timely and appropriate senior management support. In particular, the respective responsibilities of the UNODC in-country Representative and those of Headquarters-based managers should be streamlined, with a view to ensuring that the project manager enjoys adequate levels of decision-making authority, while being subject to effective and timely accountability. CONIG and RSAME should initiate discussions to improve cooperation and coordination in that respect. The Division for Management (including the Financial Resources Management Service [FRMS], the Human Resources Management Service [HRMS] and the Procurement Unit) should also be consulted in this respect.

Headquarters vetting of future project proposals
UNODC senior management should reinforce the vetting of project proposals. Project proposals involving budgets of a size comparable to the present project should be carefully vetted by UNODC Headquarters, in a process bringing together representatives of all divisions, and ensuring that all relevant divisions and units are aware of their share of responsibility to ensure successful project implementation. Project monitoring mechanisms should report directly to senior management, in case of necessity. Project proposals should include a thorough risk analysis, including political and logistical risks. CONIG and RSAME should consider whether the current Programme Review Committee is appropriate in this respect, and whether it should be modified to improve project vetting in the region. Within the Division for Management, FRMS and HRMS should also be consulted in this regard.

Strengthening staffing of future project teams
UNODC teams and managers involved in the design of future projects should ensure that project teams include appropriate staff. Project teams should bring together staff with substantial experience with policy and administrative expertise, in sufficient numbers to cover the various areas of expertise needed and to address the necessary pace of activities. This should include the recruitment of project managers with the required level of experience of management of large projects and sufficient internal UNODC experience. Though this issue is of broader concern, CONIG and RSAME should address this issue with regard to future projects in Nigeria.

SUMMARY MATRIX OF FINDINGS, EVIDENCE AND RECOMMENDATIONS

Findings[2]	Sources of evidence	Recommendations[3]
The project was highly relevant, in that it was based on a sound analysis of the situation of the fight against corruption in Nigeria, and addressed needs that were clearly in line with Nigeria's commitments under UNCAC. **The project approach was appropriate to addressing identified needs.** The approach based on three prongs was sound, with focus on policy development and coordination; ACA capacity building and coordination, and support to CSOs. However, **the set of outputs was over-ambitious.** The project sought to achieve a broad range of outputs in each of its three outcome components, leading to an original project design that was overly complex and calling for a range of activities that was not realistic in view of the then-prevailing political context. **Budget reporting was appropriate, though it suffered some delays.** Despite initial administrative and accounting misunderstanding, the project team delivered clear and accurate reports to the EU, demonstrating that funds and other resources were used in accordance with plans, as revised.	Project documentation Interviews Focus group meetings	**CONIG should seek to continue providing input and technical advice to ACAs in Nigeria, prioritising areas where UNODC has unique expertise and skills, or where long-term UNODC input is appropriate.** These areas include in particular the UNCAC review process; research and statistics; legislation and regulation; and the provision of intelligence software, coupled with training on its use and maintenance. CONIG should also continue to support CSOs' work against corruption, through training and advice, and through encouragement of networking between CSOs and ACAs. CONIG should collaborate with MBNP to develop an exit strategy for the project, ensuring that ACAs and CSOs continue to build on the benefits of the project in terms of capacity and training.
Support to CSO projects is likely to reinforce the monitoring of state budgets and citizens' involvement in the fight against corruption. The 10 CSOs that have received grants from the	As above	**CONIG should ensure that future projects in Nigeria should integrate work with CSOs and with ACAs**. UNODC's expertise is relevant to both sets of stakeholders, and UNODC should in future

---

[2] A finding uses evidence from data collection to allow for a factual statement.

[3] Recommendations are proposals aimed at enhancing the effectiveness, quality, or efficiency of a project/programme; at redesigning the objectives; and/or at the reallocation of resources. For accuracy and credibility, recommendations should be the logical implications of the findings and conclusions.

project, via UNDP, appear likely to achieve most of their anticipated goals, which would go some way towards enhancing the accountability of local authorities in target areas. **The project included a number of elements that indirectly contributed to the protection of human rights.** The project helped foster the rule of law and the effective functioning of the judiciary. It addressed legal loopholes that weakened the fight against corruption. It supported a greater degree of civil society involvement in the fight against corruption. These elements are all consistent with Nigeria's commitments on human rights and on anti-corruption.		encourage ACA and CSO collaboration in areas such as prevention, whistleblower protection, budget monitoring and public awareness raising. CONIG should also consider the development of a communication and public advocacy strategy in the context of support to the implementation of the NACS. CONIC should seek MBNP support to report on project progress to senior political leadership, encouraging involvement of political leaders in selected project activities.
The project benefitted from effective partnerships and cooperation. The cooperation between CONIG, EU and ACAs, as well as with MNBP, helped deliver project activities to a substantial degree, thanks in particular to the complementary skills of CONIG and UNDP. However the CSO component was insufficiently integrated with the other two. **The project is likely to achieve some impact by contributing to changing attitudes, reinforcing political will and enhancing the skills of those fighting corruption.** The substantial work done to reinforce the legislative and regulatory framework of the fight against corruption, as well as the critical mass of participants in training sessions, are likely to enhance readiness among institutions to fight corruption. **The public awareness activities by ACAs and CSOs contributed to raising the profile of the fight against corruption in Nigeria.** The ACAs' Media Working Group has devised and implemented an appropriate public awareness strategy, which has effectively highlighted the various aspects of the fight against corruption – from prevention to whistleblowing and prosecution. This also contributed to	As above	**Future projects should emphasize a Training of Trainers approach.** It is important for UNODC teams and managers involved in the design of future projects to reflect on the best ways to achieve critical mass for the acquisition of new skills. It should consider the option of using a ToT approach more systematically, or to work directly with judicial training institutions, with a view to entrenching the acquisition of new skills by ACA staff. The Corruption and Economic Crime Branch of UNODC Headquarters should also be consulted at the project design stage.

some extent to the visibility of the project as a whole, and of the EU as a donor. **The project's sustainability lies in legal and regulatory changes, acquired skills and capacity, enhanced networking and dialogue between government institutions and civil society.** These elements should be reinforced in future. An explicit exit strategy is lacking at this point, but the capacity exists to develop one in the final weeks of the project.		
The project was in line with Nigerian, donor and UNODC strategies. The project was consistent with stated FGN aims and with the EU's strategy in Nigeria. It was also in line with UNODC's mandate as custodian of UNCAC, and more specifically as a repository of anti-corruption technical expertise.	As above	**The UNODC senior management – including but not limited to CONIG and RSAME – should ensure that future UNODC projects intended for EU funding are fully in line with EU project cycle management requirements, including in relation to budget presentation and staffing levels.** They should include detailed work plans, agreed with the relevant ACAs. Staff seniority and numbers should be consistent with the anticipated scope of activities and budget, and the eligibility of expenses such as IT services should be firmly agreed at the outset. UNODC should also ensure that future project designs include a thorough political and social risk analysis, as well as risk mitigation strategies. At UNODC Headquarters, the Division for Management and the Co-financing and Partnerships Section (including the UNODC Liaison Office in Brussels) should also be consulted on this aspect.
The project's effectiveness was hampered by delays and missed opportunities. In particular, there was insufficient delivery of planned outputs in the first two years of the project. Substantial efforts and management changes since 2015 have led to significant improvements in delivery. The scale of IT equipment procurement and related support (initially foreseen in the original 2012 financing agreement) did not meet ACAs' expectations.	As above.	**Project teams and managers of future projects should have access to timely and appropriate senior management support.** In particular, the respective responsibilities of the UNODC in-country Representative and those of Headquarters-based managers should be streamlined, with a view to ensuring that the project manager enjoys adequate levels of decision-making authority, while being subject to effective and timely accountability. CONIG and RSAME should initiate discussions to improve cooperation and coordination in that respect. The Division for Management (including the Financial Resources Management Service [FRMS], the Human Resources Management Service [HRMS]

		and the Procurement Unit) should also be consulted in this respect.
Under-management hampered the project's effectiveness and efficiency. The initial project managers lacked the seniority and experience that its size and scope required. Despite the undeniable expertise and commitment of project team members, and despite the substantial improvement in project management since 2015, support from UNODC Headquarters remained beset by delays, compounding challenges to the delivery of outputs. Administrative difficulties, external events and procedural issues compounded the delays and hampered the overall delivery of project activities.		**UNODC senior management should reinforce the vetting of project proposals.** Project proposals involving budgets of a size comparable to the present project should be carefully vetted by UNODC Headquarters, in a process bringing together representatives of all divisions, and ensuring that all relevant divisions and units are aware of their share of responsibility to ensure successful project implementation. Project monitoring mechanisms should report directly to senior management, in case of necessity. Project proposals should include a thorough risk analysis, including political and logistical risks. CONIG and RSAME should consider whether the current Programme Review Committee is appropriate in this respect, and whether it should be modified to improve project vetting in the region. Within the Division for Management, FRMS and HRMS should also be consulted in this regard.
The project benefited from staff expertise, both at CONIG in Abuja and in UNODC Headquarters. The project team members were highly skilled and earned respect among ACAs for the quality of their advice and expertise on anti-corruption issues. Other support staff – short-term experts and experts based in Vienna's UNODC Headquarters – have also provided useful and timely advice, contributing to the project's overall effectiveness and impact. **The project included elements of substantial innovation.** These were in particular related to the amendment of legislation and the development of guidelines within the judiciary on matters related to the fight against corruption. Another substantial piece of innovation was related to the Household Survey of citizens' experience of corruption, a significant milestone in this field of research.		**UNODC teams and managers involved in the design of future projects should ensure that project teams include appropriate staff.** Project teams should bring together staff with substantial experience with policy and administrative expertise, in sufficient numbers to cover the various areas of expertise needed and to address the necessary pace of activities. This should include the recruitment of project managers with the required level of experience of management of large projects and sufficient internal UNODC experience. Though this issue is of broader concern, CONIG and RSAME should address this issue with regard to future projects in Nigeria.

I. INTRODUCTION

Background of the project

This is the report of the final Independent Project Evaluation of the project "Support to Anti-Corruption in Nigeria" (NGAX60), implemented by the United Nations Office on Drugs and Crime (UNODC) through its Country Office in Nigeria (CONIG), based in Abuja, Nigeria since November 2012 (project activities stated in early 2013), with the collaboration of the United Nations Development Program (UNDP) for the implementation of the Civil Society component. The project ended on 18 August 2017. With an original budget of €34m, reduced to €15m in 2015, the project's disbursed budget as at end-March 2017 was US$14,146,808, out of a total approved budget – fully pledged, supported by the European Union Delegation (EUD) in Nigeria – of US$18,533,863[4].

According to project documents[5] the overall objective of the project was "to support Nigeria in its efforts to fight corruption". The project was designed around three components, each centred around one of three expected outcomes. The outcomes were:

1. "Strengthened anti-corruption policy-making, coordination, research, monitoring and legislation, in line with the United Nations Convention against Corruption (UNCAC);

2. "Institutional and operational capacity of anti-corruption agencies (ACAs) enhanced and inter-agency cooperation improved; and

3. "Civil society organisations (CSOs) empowered to increase the provision of services and their participation in anti-corruption activities."

The European Union (EU) funded the project as part of the 10th European Development Fund (EDF). The project built on an earlier EU-funded project supporting the Economic and Financial Crimes Commission (EFCC) and the Nigerian judiciary, implemented as part of the 9th EDF. Concurrently to the current anti-corruption project, the EU also supported projects on justice reform (Support to the Justice Sector in Nigeria) and an anti-drug project (Response to Drugs and related Organised Crime in Nigeria), both implemented by UNODC and funded under the 10th EDF.

----

4 The Project Completion Report prepared by the Project Team in September 2017, listed a Preliminary Final Expenditures amount based on ProFi information of US$12,705,402, against the same overall budget amount. The Completion Report noted that this was a provisional figure and that the final ProFi figure may differ.
5 See for example: Revised Description of the Action, UNODC (September 2016). This contains identical language formulating the objectives and expected outcomes of the project, to that found in other documents such as logical frameworks and the evaluation TOR.

According to the September 2016 revised "UNODC Anti-Corruption Description of the Action", the target groups for the NGAX60 project included:

- Entities involved in generating information and analysis an those applying the resulting evidence base to policy planning, implementation and institutional cooperation (component 1);

- The management and staff of the relevant ACAs (component 2);

- Government and non-government actors involved in social mobilisation against corruption, and mostly CSOs (component 3).

To achieve the planned outcomes, the project logical framework identified eleven specific outputs, related to each of the above components. These can be summarised as follows:

- Outcome 1:
  - Enhanced anti-corruption coordination mechanisms;
  - Improved research capacity;
  - Strengthened legislative drafting capacity.
- Outcome 2:
  - Institutional strategies for ACAs;
  - ACA corruption prevention capacity building;
  - Anti-corruption law enforcement capacity building;
  - ACA public awareness raising capacity building.
- Outcome 3:
  - CSO support implementation plan;
  - CSO institutional capacity building;
  - Grant scheme for CSO projects;
  - Enhanced CSO networking and public awareness activities.

In addition to planning, project activities essentially included:

- Coordination meetings. This was important in view of the large number of ACAs, their interlinked mandates and wide differences in organisational capacity. Much effort went in particular, in supporting the Inter-Agency Task Team (IATT), see below, in bringing the ACAs together around the fulfilment of specific tasks – such as for example, public awareness raising about issues concerning the fight against corruption.

- Training on project management, technical aspects of the corruption prevention and law enforcement and other specific anti-corruption topics (including legislative drafting). The training activities, which included Training of Trainers (ToT) sessions, were among the most numerous activities undertaken, with the aim of raising the work standards of the ACAs, and particularly of ensuring they could all contribute to the fulfilment of Nigeria's commitments under UNCAC.

- Mentoring and other technical assistance and advice to ACAs, including on the deployment and use of Information Technology (IT). The mentoring component was emphasised partly as a result of the 2015 Mid-Term Evaluation (MTE) of the project. It was developed in response to the perceived need to enhance technical competencies within specific ACAs and to foster more generally a readiness to implement reforms and improve the overall performance of ACAs. The original project document and UNODC staff involved in the project design also noted the need for technical advice and support in relation to IT, specifically with a view to ensuring that the ACAs could share information and intelligence on corruption-related issues, so as to facilitate the timely prosecution of cases.

- Research on corruption-related issues, including household survey on corruption as experienced by citizens. The research component also constituted a central tenet of the project: while there is a large body of research on large-scale corruption in Nigeria, and a large body of case law addressing various aspects of law enforcement, there was until recently very little systematic social research based on scientific methodologies, measuring the extent to which ordinary Nigerian citizens experience corruption in daily life, particularly in their interaction with government authorities and social services. The project proposed to address this gap in knowledge through a large household survey, the findings of which were published before the end of the project in mid-August 2017.

- Advocacy to political decision-makers and legislators. This aspect of the project design was aimed at enhancing the momentum for implementing legislation and regulations addressing corruption, and for fighting impunity. Originally based on the assumption that Nigeria would adopt a National Anti-Corruption Strategy at about the start of the project in 2012, the implementation of this aspect was hampered by the slow pace of work on the NACS – which was only approved on July 5, 2017.

- CSO capacity building and funding scheme. This component was designed on the understanding that institutional capacity building would not deliver UNCAC implementation on its own, without monitoring by Civil Society and accountability mechanisms that enhance the transparency of the fight against corruption at all levels. The component built on the existence of a wide range of CSOs in Nigeria that address corruption issues, either directly or indirectly as part of their work in support of citizens' economic and social rights. The component addressed the need to enhance expertise on corruption among CSO activists – for example in terms of analysis and monitoring of budget implementation and projects at sub-national level. On the other hand, it provided funding for a number of CSO projects in different parts of Nigeria, addressing various aspects of the fight against corruption – from awareness-raising to budget monitoring and access to justice.

The project was supported by the EU in the following framework:

- A Financing Agreement was signed between the EU and the Government of Nigeria in early 2012. This specified the project's title and overall budget, and included in an Annex the Technical and Administrative Provisions for Implementation, which indicated that the project would be implemented via "Joint Management" between the EU and UNODC.

- This approach was fulfilled through a Contribution Agreement signed in November 2012 between the EU and UNODC. The Agreement was signed on behalf of the two

organisations, respectively by the Head of Operations of the EU Delegation in Nigeria and the UNODC Representative in Abuja (head of CONIG).

Context of the project

Until 1999, Nigeria was under military rule. In 1999, former military head of state Olusegun Obasanjo was elected as a civilian president, on the platform of the People's Democratic Party (PDP). This marked the end of military rule in Nigeria and the beginning of democratic dispensation. President Alhaji Umaru Yar-Adua, elected in 2007, signalled his willingness to address corruption, but he fell ill and died in office in 2010. His Vice-President, Goodluck Jonathan, took over as president, and was elected president in his own right in 2011.

Jonathan stood for re-election in 2015 but lost to Muhammadu Buhari, the current president whose term runs until 2019. Buhari, from the All Progressives Congress (APC), won the election on a platform where the fight against corruption featured prominently. Upon assuming office, he established the Presidential Advisory Committee on Anti-Corruption (PACAC). President Buhari has been absent from Nigeria for substantial periods of time since his election to undergo medical treatment in London. As a result, day-to-day government is reported to be largely led by Acting-President Yemi Osinbajo, a lawyer and law professor. Osinbajo, who has written about the impact of corruption on development during his academic career, also repeatedly emphasised the commitment of the Government of Nigeria to fight and prevent corruption.

Anti-corruption institutions

Nigeria signed UNCAC in December 2003 and ratification occurred a year later. Unlike many other African countries, Nigeria is not dependent on foreign aid, thanks in part to its exports of oil and gas.

Over the years, Nigeria established a range of anti-corruption institutions to address various aspects of the fight against corruption. These include in particular, in a rough categorisation, the following key agencies:

- Institutions addressing corruption in public procurement: Bureau of Public Procurement (BPP); Code of Conduct Bureau (CCB); and Code of Conduct Tribunal (CCT);

- Institutions dealing with law enforcement: Economic and Financial Crimes Commission (EFCC); Nigerian Financial Intelligence Unit (NFIU); Independent Corrupt Practices (and other Related Offenses) Commission (ICPC); Special Control Unit on Money Laundering (SCUML);

- Institutions dealing with public complaints, public information and government policy coordination: Presidential Advisory Committee against Corruption (PACAC); Public Complaints Commission (PCC); Technical Unit on Governance and Anti-Corruption Reform/Inter-Agency Task Team (TUGAR/IATT), Bureau on Public Service Reform (BPSR).

These and other institutions such as the Nigerian Police Force all play a role in the fight against corruption. Some institutions have formal law enforcement powers whereas others are of a judicial

or a more advisory nature, and yet others focus on policy development and legislative work, together with the government at large and the National Assembly.

At the time the project was designed, the government was working on the development and adoption of a National Anti-Corruption Strategy (NACS) and Action Plan. Though this strategy work was initiated before the project started in 2012, the NACS was not formally adopted by the government till mid-2017. When it was eventually approved by the Federal Executive Council, on 5 July 2017, the Federal Ministry of Justice specifically stated that UNODC would be involved in a "partnership" to address the NACS' implementation.

The evaluation

A team of three independent external evaluators conducted the evaluation, i.e. a team leader and two substantive experts. They carried out a desk review in June 2017, mainly based on a desk analysis of extensive project documentation provided by CONIG. A field mission took place from 13 to 19 June and from 27 June to 3 July 2017. During the field mission, the evaluators met representatives of all the participating Nigerian Anti-Corruption Agencies (ACAs) as well as a broad range of other stakeholders, including a representative of the EUD, trainers and mentors, current and former members of the project team, representatives of Civil Society Organisations (CSOs) and others. They also held phone interviews with people previously involved in the project, who are no longer in Nigeria. The evaluation team leader also met UNODC staff and managers who had worked on the project at UNODC Headquarters in Vienna.

This report is structured as follows:

- The present introduction outlines the main aspects of the project, as well as a brief overview of the Nigerian social and political context of its implementation. It also outlines the evaluation methodology, as developed during the inception stage.

- The Findings chapter provides evidence-based responses to the evaluation questions set out in the TOR. These essentially follow the internationally agreed standard evaluation criteria of relevance, effectiveness, efficiency, sustainability and impact, and also address issues including project design, partnerships and cooperation, human rights and gender, while also identifying good practices and added value of the project.

- The Conclusions chapter provides a synthesis of the findings, identifying patterns and general lessons that go across evaluation criteria. The conclusions mostly draw lessons from the past, but some are also formulated in forward-looking terms, in that they may apply to future similar projects that CONIG, UNODC in general, EU and other donor agencies and development partners, may design.

- The Recommendations chapter sets out the actions that the evaluators believe could or should be taken by specific stakeholders in the project – CONIG/UNODC, donor and national stakeholders – to follow-up the project. Some of the recommendations may also apply to new projects and different national contexts.

- The Lessons Learned chapter draws out a number of elements that could be taken into account in the implementation of future projects.

Evaluation Methodology

The methodology of the evaluation, while mindful of the key differences between the project components, sought to identify common patterns across all of them, and above all to assess each component against the standards and objectives that were set for each of them. The aim was to be able to assess accomplishments and challenges in each component of the project, while also drawing common patterns to the extent possible. A mixed-method approach was used, combining document analysis, semi-structured interviews and focus group meetings with a broad range of project stakeholders. Furthermore, the evaluation implemented and followed an inclusive and gender-sensitive methodology.

The evaluation methodology considered the collection and analysis of both quantitative and qualitative data/information through triangulation of sources and methods, including interviews with beneficiaries, project staff and consultants, focal points, and other key informants and the use of various collection methods (e.g. documents review, interviews, survey/s, and validation meetings).

In essence, the evaluation addressed three levels: project; lessons learned and good practices; and future action:

- In terms of the project, the evaluation was required under its TOR to address the activities, outcomes and impacts of the project, in accordance with the criteria set out in the TOR – corresponding both to the standard evaluation criteria of the Organisation for Economic Development and Cooperation (OECD) relevance, efficiency, effectiveness, impact and sustainability, as well as partnerships and cooperation and human rights and gender mainstreaming and to the guidance of the evaluation norms and standards of UNODC and the United Nations Evaluation Group (UNEG).

- Lessons learned and good practices: assessment at that level attempted to identify patterns, unique to a project component or common to all three, that highlighted particularly effective or impactful work methods or implementation mechanisms that demonstrated particular effectiveness.

- Future action: on the basis of the first two elements of the evaluation, the evaluation team, in its conclusions and recommendations, sought to develop suggestions for future approaches by CONIG, UNODC as a whole, and the EU in the context of the 11th EDF.

The evaluation used the following tools:

- Analysis of project documentation: This formed the basis of the Inception Report, submitted in early July 2017: the analysis led to the development of preliminary findings under each of the main evaluation criteria set out in the TOR, and to the determination of judgement criteria to help answer each of the evaluation questions listed in the evaluation TOR.

- Interviews with key informants: These were mostly semi-structured interviews – that is, interviews arranged around a set of thematic areas and related questions, formulated in an open manner so as to avoid suggesting answers and to allow respondents to formulate their opinions in their own terms. Some interviews dealing with specialist matters – such as IT or financial management, for example – were more structured because the respondents were asked to address particular points directly relevant to their expertise and field of involvement in the project.

- Focus group discussions: With groups of ACA representatives who took part in coordination activities, ACA staff who participated in training or ToT sessions, as well as representatives of CSOs that received funding from the project for anti-corruption activities.

It was not proposed to use a survey as part of this evaluation. This was because there was abundant project documentation and because the evaluators had access to all the main stakeholders: ACA staff and senior representatives, as well as to representatives of all the CSOs that received grants under the project. In this context, a survey would not have added substantial value. The evaluation team applied a gender-sensitive approach, ensuring that its tools did not involve gender bias and actively encouraging the participation of women ACA staff members in focus group discussions.

The main constraint affecting the evaluation was that some of the CONIG and UNODC Headquarters staff and managers involved at the time the project was designed (2011-2012) and at the start of implementation (2013) had moved on to different posts. Also, it became clear during some interviews that ACA staff did not always distinguish between activities undertaken as part of the initial phase of the present project, and activities undertaken in the last phase of the previous EU-supported one. The team was able to mitigate this constraint by relying on written documents from the earlier period of the current project. There were also enough interviews and focus group discussions to ensure that the views of interviewees could be triangulated (cross-checked) effectively.

The evaluators developed an Evaluation Matrix, elaborating on the evaluation questions listed in the TOR, adding judgement criteria/indicators, as well as listing sources of information. The matrix is reproduced in Annex V of this report.

II. EVALUATION FINDINGS

Design

The project document included an analysis of the impact of corruption on Nigeria's society and economy, which underpinned the design of the project. The design also took into account Nigeria's signature to UNCAC and the existence of a range of ACAs, and noted the possible adoption of a National Anti-Corruption Strategy (NACS).

From the description of the project document, strengthening integrity and reducing corruption has been a priority for Nigeria for a number of years. While the anti-corruption sector in Nigeria currently has a reasonable quantity and quality of legislative texts, statutes and mandates to carry out its work and a number of anti-corruption institutions have been created, there was however a risk of a fragmented and poorly coordinated anti-corruption sector in the country and a need to strengthen the capacities of law enforcement and prevention agencies. The NGAX60 project was built on the achievements of the previous European Union-funded project under the 9th European Development Fund (EDF). Since the start of its anti-corruption efforts, Nigeria has demonstrated resolve and has progressed with its policy goals, in particular with regard to adopting a legal framework, establishing anti-corruption institutions and signing international instruments, such as the UNCAC, to address this problem. The project was based, in essence, on the following analysis and hypotheses:

- Nigeria, though committed to fighting corruption (as demonstrated both by its membership of UNCAC and commitments by successive governments) lacks a comprehensive policy framework to do so effectively.

  - The key hypothesis in this respect was that a NACS (and a corresponding Action Plan) should be encouraged and supported in that they were key to combating corruption in its various forms.

- Nigeria has established an array of ACAs, which it funds to a considerable extent. However, these agencies, despite the commitment of staff, lack the capacity, in terms of expertise and technical equipment, as well as organisational development, to implement their respective mandates to the full required extent.

  - The key hypothesis with regard to the ACAs was that their capacity could be developed through training, technical advice and the provision, where appropriate, of equipment and capital goods. Combined with the policy and legislative support referred to above, this support would help ensure that an anti-corruption strategy could be effectively implemented.

- In addition to reinforcing the above state anti-corruption apparatus, it was necessary to raise awareness among the Nigerian public about the true extent of corruption, and also about remedies available and ways in which corruption could be prevented and punished. It was

also necessary to ensure that civil society joined in a debate with policy-makers on policies and practices to fight corruption.

- The key hypothesis in this regard was that the fight against corruption required the involvement of all actors in society. Fighting corruption required prevention/dissuasion as well as prosecution/punishment. It was also directly linked to transparency, and therefore to trust in the legitimacy of government.

This analysis and related hypotheses outlined a theory of change, which held that policy work, ACA capacity building and CSO support, taken together, would achieve a positive impact on the incidence of corruption in Nigeria. The evaluation tested each of the above hypotheses. It found that the design was appropriate in terms of the three hypotheses:

- The need for better and more timely coordination among the ACAs was acknowledged by stakeholders. PACAC and TUGAR/IATT played a substantial role in this respect. It was clear also, from interviews with stakeholders, that the fight against corruption was strengthened at times when Nigeria's top political leadership, from the President on, took a strong public stance on addressing it. This has been the case under President Buhari, but was clearly less so under President Jonathan – the two men in power during the project period.

- The hypothesis concerning ACA capacity building was justified too. Though some agencies, such as the EFCC, had grown substantially in terms of staff numbers since the early 2000s, the number of successful prosecutions had not grown at the same speed. This might have been in part a function of political will, as noted above. But it was doubtless also an indication that the skills and investigative capacity of some ACAs had not necessarily kept pace with the increased sophistication of corrupt practices. It was therefore appropriate for the project to envision a substantial ACA capacity building component, including the provision of new IT capacity that took account of technical advances and helped the ACAs communicate securely and effectively with one another.

- The hypothesis concerning the role of Civil Society in the fight against corruption was also certainly justified, in that there was – and still is – a substantial need for public information about corruption: its nature, impact, and ways to fight it. Civil Society also was able to play a role complementing the ACAs to address prevention and fight impunity.

Even though the project design took into account Nigeria's commitments under UNCAC, it was designed when no definite National Anti- Corruption Strategy for the Federal Government of Nigeria (FGN) was in place, which was not anticipated by the original logical framework. This was noted in the Mid-Term Evaluation (MTE) report, which also stated that "failure to adopt the National Anti-Corruption Strategy has hampered the full implementation of the project". This was particularly the case in relation to Output 1 of the project ("Anti-corruption policy-making, coordination and monitoring mechanisms are strengthened and legislation is improved"). The non-adoption of the NACS at the time the project started affected the holistic implementation of Outcome 1, in that the project was not fully in line with the FGN anti-corruption objectives and actual policy framework of Nigeria.

Subsequently, in response to the Mid-Term Evaluation (MTE) in 2015, the 2016 Project revision document revealed that the logical framework was also reviewed with a refocused work plan for 2016 – 2017. The project's objective was rephrased from:

"The Nigerian Government is supported in its efforts in preventing and fighting corruption"

to:

"To support the Nigerian Government in its efforts in preventing and fighting corruption."

Outcomes 2 remained unchanged while Outcomes 1 and 3 remained fundamentally the same, but were reworded to reflect a more result-based approach.[6] Outcome 1 activities were then structured to be impactful whether or not a NACS was approved during the remainder of the project. The outcomes and outputs were rephrased so that the project could be implemented independently from the approval of NACS. The NACS (2017-2021) was eventually approved by the Federal Executive Council on 5 July 2017. This report will argue (see "impact" section) that the adoption of the NACS may to some degree be attributed to this project.

Consultation on design

Project documentation indicates that the project was identified, conceived and formulated by the EU in close consultation with the UNODC team that implemented the 9th EDF project. It was further developed in collaboration with national stakeholders. Interviews with partners and beneficiaries of the project indicated that, in their perception, some stakeholders were not sufficiently involved in detailed design-stage discussions. Stakeholders stated that the discussions they had been involved in were general and did not address the design of the project itself. While this perception by ACAs may be debatable, it does appear that some ACAs were consulted more closely than others, partly because the original project design did not envision the involvement of all 14 of them.

CSOs also suggested that they had not been sufficiently involved in the project's design. This can be explained by the nature of the CSO component, which was based on a sub-granting approach: it was not possible to know at design stage which CSOs would receive a grant, and it was therefore impossible to consult these CSOs specifically. Nevertheless, the CSOs correctly noted that the CSO component of the project was not sufficiently linked to the other two components, which were more institutional. In hindsight, a project design that encouraged more contacts and networking between ACAs and CSOs would have enhanced the relevance of the project as a whole. It may also be assumed that, had the project design been discussed more closely with all ACAs, Outcome 1 could have been formulated in a way that did not assume that a NACS would be adopted by 2013.

Design of the logical framework

The original project logical framework (logframe) was substantially reviewed and modified as a follow-up to the MTE carried out in 2015. The evaluators compared the 2012 version of the logframe, as it stood at the time the EU and UNODC signed the contribution agreement, with the revised logframe as it stood in 2016 in the revised description of the action.[7] The formulation of the project objective and of the three outcomes was similar (though not identical, as indicated

---

6 Outcome 1: Strengthened anti-corruption policy-making, coordination, research, monitoring and legislation, in line with the UNCAC (instead of "Anti-corruption policy-making, coordination and monitoring mechanisms are strengthened and legislation is improved.")

Outcome 3: Civil Society Organisations empowered to increase the provision of services and their participation in AC activities (UNDP implementation) (instead of "Civil Society Organizations empowered to increase the provision of services and their participation in AC activities enhanced (UNDP implementation)")

7 See respectively the documents "X60 2012 Contribution Agreement Annex 1 (Logframe Only)", and "Revised Description of the Action", 2016, pages16-21. It is to be noted that the Revised Description document included both the new logframe and the old one (pages 22-28).

above) in both versions. The 2016 version made a more explicit link between the project and high-level UNODC strategic objectives at country and global level, and with the fulfilment of the Sustainable Development Goals (SDGs). There were further substantial changes, including in particular:

- Formulation of indicators. Some indicators, which in 2012 referred to the implementation of the NACS, were logically deleted since no NACS was in force. Other changes reflected an attempt to rely mostly on quantitative indicators.

- Identification of outputs. This is where the most substantial changes were made, as follows:

  - Under Outcome 1, one output in the original logframe concerned initial project planning – this was logically deleted since the project was already half-way through implementation. It was also logical to delete an output concerning the establishment of a monitoring and evaluation system for the NACS. The other outputs were essentially reworked into a set of three, emphasising coordination among ACAs, policy development, research capacity and legislative drafting.

  - Under Outcome 2, a reference to initial planning was also removed, as was a reference to cooperation among ACAs (already covered under Outcome 1). The other items (capacity building for prevention, enforcement and public awareness) were essentially maintained, as was an output concerning support to the development of ACA institutional strategies.

  - Outputs under Outcome 3 underwent little change, except for the deletion of an output on overall project planning.

In both versions of the logframe, activities were listed under each output, as appropriate. Both logframes listed means of verification and risks – with risk mitigation strategies included in the narrative project description.

Both versions of the logframe were basically sound, even though they both presented some methodological weaknesses (for example, it was unnecessary for the 2012 to refer under each outcome to the development of a project implementation plan). The key common weakness of the logframes, however, was that they did not come with a work plan covering the entire project period, and agreed with the relevant stakeholders. The project documents did include quarter-by-quarter costed overviews of the delivery of each output, but these high-level work plans did not include an activity-by-activity breakdown of the implementation of each output, and did not make clear how each ACA would be involved.

As a result, the project design was essentially incomplete. This eventually led to the project team being placed in a situation where it had to negotiate the project's implementation plan every year with each participating ACA (and with UNDP for Outcome 3). This placed a heavy planning burden on the project team (see below, section on effectiveness). The design shortcomings further made it difficult for the project to address the identified needs, due to over-optimistic assumptions and a highly ambitious agenda of activities – which eventually proved unrealistic in view of available human resources, management constraints in participating ACAs and other project management issues, and in view of the changing political context of the country over the project period.

Relevance

Analysis of project documentation and interviews with a broad range of stakeholders demonstrated that the project was highly relevant, in that it identified substantial needs in Nigeria in relation to the fight against corruption and addressed those in ways that were fully in line with UNCAC, and were broadly consistent with the policies and programming approaches of Nigeria, CONIG and the EU. However, the design shortcomings outlined above hampered relevance in that they made it more difficult for the project to address the identified needs, due to over-optimistic assumptions about NACS as outlined above, as well as a highly ambitious agenda of activities – which eventually proved unrealistic in view of available human resources, management constraints in participating ACAs and other project management issues, and in view of the changing political context of the country over the project period.

As mentioned above, the project design was based on a sound overview of the key institutions working on anti-corruption issues in Nigeria, taking into account the variety of legal mandates and scopes of work of these ACAs. Nevertheless, project progress reports and the MTE report suggest that the project may have overestimated the skill level of some ACA staff and the capacity of ACAs to reconcile their internal governance and financial constraints with the capacity building support proposed under the project.

The project was aligned with EU policies. The overall objective of the 10th EDF[8] was basically to promote good governance and contribute to Nigeria's efforts in enhancing transparency, accountability and combating corruption. The specific objectives included the following:

- To provide effective support to drafting legislation, preparation/implementation of anti-corruption strategy;
- To improve the technical/operational capacity of seven main agencies dealing with anti-corruption, namely PCC, CCB/CCT, IATT/TUGAR, ICPC, EFCC, BPP, BPSR;
- To increase public confidence, awareness, capacity and participation of Civil Society in the fight against corruption and its capacity to advocate governance reforms.

To a considerable extent the project was in line with the above objectives. The three major outcomes of the project corresponded to the 10th EDF specific objectives. The 10th EDF targeted seven main ACAs, while the project had fourteen institutional beneficiaries and ten CSO grantees: this suggests that the number of beneficiaries may have been expanded after the 10th EDF was designed.

The initial design of the project focused largely on agencies with prosecutorial powers. However after the review in 2015, activities proposed in the work plan ensured that more attention was given to prevention (public service ethics, conflicts of interest, assets declaration, procurement, and corruption risk assessments) to ensure a balanced approach between law enforcement and prevention.

The project was also in line with UNDAF and UNODC strategies. The UNDAF identified governance and human rights as the second focal sector of intervention aimed at supporting governance improvements at state and local authority level. The project strategy and design falls under the framework of UNDAF II and is in line with the UN commitment to contribute to the achievement of national development aspirations, the realization of the MDGs and the advancement of the implementation of the Paris Declaration emphasizing ownership, alignment and mutual

---

[8] See: Final report of Formulation of the Anti-corruption Support Project in Nigeria 10th EDF, by Francis MONTIL, Nadew GEBEYEHU, Constantine PALICARSKY, April 2011.

accountability among other principles. The project strategy is also consistent with UNDAF III priorities, which support national entities to address the underlying cause of corruption through research, capacity building and improved coordination amongst anti-corruption institutions.

The project design was also aligned with UNODC's Regional Programme for West Africa (2010 – 2014). The project contributed to the implementation of sub programme (i) of the Regional Programme: "Building Justice and Integrity" (outcome 1: "Member States take action to align their domestic legislation on corruption with international legal standards"). The project document observed that "as a member of the United Nations Country Team in Nigeria, all UNODC's interventions in the country are guided by, and fall under the framework of the United Nations Development Assistance Framework for Nigeria (UNDAF) for the period 2009-2012 extended to 2013". The document noted that the project is in line with UNODC's thematic programme on Corruption, Economic Fraud and Identity-related Crime for 2012-2015.

Contributing to the relevance of the project was its timeliness. The project came at a time of lean budgetary conditions in Nigeria and nationwide economic difficulties, both related to low oil prices. This means that the government, at the time, was not in a position to prioritise additional budgets for the ACAs. The project therefore contributed to a degree of continuity in the ACAs' institutional development.

It is to be noted that the project's final design involved more stakeholders than its original one. As mentioned above, the 10th EDF referred to supporting seven ACAs, and this is how the project design started. Nevertheless, it eventually developed to encompass all fourteen national ACAs in Nigeria. One reason for this scaling up was that UNODC's strategy was based on the four pillars derived from UNCAC: preventive measure, international cooperation, asset recovery, and criminal law enforcement. This meant that it was logical to involve all ACAs irrespective of their specific mandate. Another argument in favour of including all ACAs in the project was the focus on coordination among agencies: this required covering all of them.

This approach was relevant, in that it was also in line with the principles of the Open Government Partnership (OGP), which Nigeria joined in July 2016: in this context Nigeria committed to creating platforms for sharing information among ACAs, other law enforcement agencies and other stakeholders in order to strengthen Nigeria's asset recovery legislation. This platform further underpinned collaborative effort between all ACAs to fight corruption and to improve integrity, transparency and accountability[9]. The OGP approach was also consistent with the formation of ACA working groups on asset recovery (chaired by EFCC); prevention (chaired by CCB); investigation and prosecution (chaired by ICPC); and safe reporting (chaired by PCC).

The extension of the project's scope to all fourteen institutions was justified as outlined above, and relevant in the Nigerian context because of a clear need to enhance inter-agency coordination. Nevertheless, the extension had the inevitable side-effect of diluting support originally planned to the seven initial ACAs. It also enhanced the ambitiousness of the project, and therefore the challenge of effective implementation (see effectiveness section below).

Beyond the state actors' beneficiaries, the project strategy took into account the institutional development, legal environment and capacity of CSOs, ten of which received grants. The CSOs' needs in terms of capacity building and advocacy was a major selection criteria considered by

---

9 See Nigeria's National Action Plan following her commitment to join the Open Government Partnership (OGP) in July 2016, https://www.opengovpartnership.org/countries/nigeria

UNDP in implementing outcome 3 of the project. UNDP did a mapping of all the CSOs and found capable CSOs at the sub-national level, out of which ten CSOs received grants to implement anti-corruption intervention in ten states of the federation. The need and capacity assessment and grant scheme for the CSOs was done in phases including building capacity of CSOs peers; budget monitoring and; education and corruption. The project also saw the need to establish an advisory body for CSOs grantees to oversee the interventions carried out by the CSOs grantees and possibly mentor them. This body attests that the NGAX60 project is one of the projects that have succeeded in facilitating the interface between government and civil society in the fight against corruption. As a result, it can be said that the CSO component of the project was also relevant, in that it identified a clear need for support and provided it in a targeted and strategic manner.

Could the project have been made more relevant? This question can be answered by considering the following aspects:

(a) In terms of overall analysis of the fight against corruption in Nigeria, there is no ground to believe that a different problem analysis would have made the project more relevant. The analysis was sound and was broadly shared by the FGN as well as by the EU and UNODC.

(b) The project's underlying assumption, in its original design, that it would be implemented at a time when a NACS would be in place, was logical in the context of UNCAC commitments and in view of statements by political leaders. Nevertheless, the expectation related to the NACS introduced a degree of uncertainty in the early project period, and may have detracted from a focus on the specific needs of individual ACAs.

(c) It does not follow from this that the project design should have focused solely on the needs of ACAs and not taken into account the overall need for a national strategy. This is because inter-agency coordination, political leadership and a holistic approach to the fight against corruption are essential to successful UNCAC implementation.

(d) Nevertheless, the project design could have benefited from a more thorough risk analysis, addressing more explicitly the risk that a NACS not be adopted as expected, and building elements of resilience into this aspect of the project design. This means in particular that the formulation of project outcomes and results could have been formulated in a way that makes them as independent as possible of assumed future government action.

The relevance of the project could also have been further enhanced by addressing increased CSO integration.

- Support to CSOs was the focus of Component 3 of the project, largely separate from the two other components, which were focused on policy and institutions. While it made sense to devote an entire component to CSOs, and while the needs in relation to them were well understood, it is regrettable that the design of the project did not foster more contacts and participation in joint activities between ACAs and CSOs. This was in part due to the fact that Component 3 was implemented by UNDP and therefore remained at arm's length from the project team. Nevertheless, it could theoretically have been possible to build more bridges between the components, for example by having CSO representatives participate in some of the training sessions designed for ACA staff, and by involving CSOs more closely in the public awareness raising activities implemented under the project.

- The project would also have benefited from more direct reporting on anti-corruption strategy between the project team and the political section of the EU Delegation, with a view to informing the political dialogue between the EU and the Government of Nigeria.

Efficiency

In view of the documentation and interviews obtained, the project was efficient in terms of the relationship between mobilised human and financial resources and the amount and quality of outputs produced and results achieved. The project's outputs were of a high standard, as was the level of expertise and technical assistance provided in various forms: from project team members to Vienna-based staff and outside experts, mentors and trainers, CONIG was able to identify and hire outstanding experts, who individually and collectively made a substantial contribution to the achievement of project objectives. As for the financial resources required, these were high – over US$3m million per year on average – but in line with previsions.

Nevertheless, the efficiency – and to some extent the effectiveness – of the project was marred by substantial organisational, administrative and management problems, which together led to substantial delays in the implementation of activities. Procedural and management issues led to the scaling back of activities – particularly in relation to the provision of IT support and technical advice to the ACAs – which had a substantial impact on the achievement of project objectives and amounted to a regrettable missed opportunity.

Several of the issues discussed in this section are of a systemic nature, in the sense that they concern UNODC's work and management process, as well as the interaction between those and the EU's project administration procedures and reporting mechanisms. However, it must also be borne in mind that some of the issues were related to external contingencies, largely outside the control of UNODC or the EU Delegation.

Value for money
On the basis of the project documentation, the efficiency of the project in terms of value for money seems appropriate in view of the expenses incurred, the quality of the expertise of the staff and consultants involved, and in terms of adaptation to operational constraints in Nigeria – not a low-cost environment.

The project budget was substantially reduced during implementation, partly because absorption capacity was lower than initially assumed, partly as a result of the delays in implementing activities, and partly because of the challenges related to annual planning of activities in consultation with the participating ACAs (see effectiveness section below). The reduced budget, however, is on course to be spent in accordance with its last revision in 2015/2016.

The expertise and skills of the project team, trainers and consultants supported by the project were of a high standard, as exemplified by research – including the household survey – which led to the production of high quality outputs. Similarly, training materials and training sessions have also been of a high standard, according to reports and project documentation. The same was true of mentoring, each of the consultants recruited to that end having demonstrated extensive expertise in their areas of specialisation.

Externalities
Interviews with a broad range of stakeholders, CONIG and UNODC Headquarters staff showed that two important factors affected project implementation, unrelated to the project's design. These were:

- The attack on the UN building in Abuja in August 2011, which killed 21 people and wounded over 70 others. The attack, claimed by the violent group Boko Haram, had a durable impact on the work of CONIG in Nigeria, including reverberations on staff recruitment and retention. At the time UNODC was recruiting international staff to manage the project, in early 2013, the attack was still fresh in staff minds – CONIG was one of the agencies that lost personnel in the attack.
- Staff turnover, at CONIG in Abuja as well as in the EU Delegation, meant that many of the people who had originally designed the project – and who had worked on the previous, 9th EDF-funded project – were not present in Nigeria when project implementation started. For example, the CONIG Representative in Nigeria at the time implementation began had not been involved in the design phase.

A third factor, probably less important, was that UNODC shifted to a new, UN Secretariat-wide administrative system known as Umoja, during 2015. The shift, which had been in the making for over a year at UNODC, streamlined administrative procedures, including budget planning, financial reporting and procurement. For a number of reasons – including lack of detailed knowledge about Umoja among some staff at CONIG in Abuja; delays in the project team obtaining support from Vienna Headquarters; and continued reliance on old work methods – the introduction of Umoja was widely reported by staff in Abuja to have compounded implementation delays caused by management problems such as those outlined below.[10]

Project management
The key area of weakness in terms of efficiency has been with project management, if this is understood to encompass the actions of the project team, all accountability and supervision mechanisms (including those related to project design) and the systems in place to take corrective action when necessary.

It is important to note that the difficulties encountered with project management were, in the overwhelming majority of cases, not related to the skills, competence or commitment of individual staff members or managers. On the contrary, the evaluators were impressed with the depth of expertise of the project team members and of UNODC managers implementing the project, at CONIG in Abuja and at the Regional Section on Africa and the Middle East (RSAME) in Vienna, as well as in other parts of UNODC Headquarters. There was also no question that the staff enjoyed a high level of regard on the part of their counterparts in ACAs, and that managers met by the evaluators had detailed knowledge of project management issues at stake, and had pro-actively addressed concerns as they arose.

Nevertheless, systemic difficulties substantially hampered the efficient and effective implementation of the project. These were the following, in particular:
- **Insufficient vetting of the project proposal**. Interviews with various stakeholders showed that, while UNODC Headquarters staff and managers were consulted on various aspects of the project design, there was no specific inter-divisional process for senior level "sign off" on the overall project proposal.[11] Responsibility for the entire project

---

[10] It should be noted that lack of familiarity with Umoja was not specific to CONIG. Headquarters staff also told the evaluators that they had to "learn by doing" in relation to implementing Umoja.
[11] Interviewees in Vienna stated that this had since changed. A project such as this one would today have to be discussed in an inter-divisional meeting, and would only be formally submitted to

development process was devoted to CONIG in Abuja.. This approach did not take sufficient account of the risk that UNODC's reputation as a whole could be impacted, should significant implementation difficulties arise. There was no sufficient awareness at the start of the project of the potential risks related to implementation, despite the substantial size of the project budget, the sensitivity of the subject matter, and the complexity of the political environment.

- **Project team size and experience**. The project team at CONIG, until at least 2015, lacked the staff necessary to implement the project successfully, in that it collectively lacked the necessary experience managing projects of a size and complexity similar to X60. This improved in the last two years, though staffing remained insufficient – the team lacked, for example, a full-time procurement expert, despite the fact that the project was expected to devote on average two to three million US$ per annum to procurement of equipment and services. Although the project team members all had relevant expertise, there was simply too few of them to liaise effectively and in a timely manner with all the relevant stakeholders.

- **Support from Headquarters**. The Abuja project team received substantial administrative support by Headquarters staff in a range of areas, including procurement, financial planning and reporting to the EU. This support was provided by staff in relevant Headquarters units, each in their areas of specialisation. This was not sufficient to compensate the intrinsic understaffing of the core project team, in staff size and seniority terms. Also, due to the relative dispersion of supporting units in Headquarters, there was little Headquarters-level overview of the entirety of support provided, or needed, by the team. This situation contributed to the accrual of operational delays.[12]

- **Complex project monitoring mechanism.** According to interviews and to project reports, the project team, and its manager, reported to the CONIG Representative, who in turn reported to RSAME at Headquarters and ultimately to the Director, Division for Operations. In practice, this meant that the project did not necessarily receive the real-time senior management monitoring attention that its size and political implications required.

  It is notable in this respect that, while the project began officially in early 2013, and while it became clear by end-2013 that the project would suffer substantial delays due to slow staff recruitment and delays in procurement, substantial corrective action was only taken from late 2014 onwards, and particularly in 2015 as a result of the MTE. Some of the delays were predictable – such as those related to the recruitment of international staff, in view of the externalities mentioned above – and others were compounded by administrative problems. Nevertheless, the fact that corrective action was itself delayed in an indication that project monitoring within UNODC was not as close as would have been necessary.

- **Inadequate Project Management Committee mandate.** A Project Management Committee (PMC) was formed, bringing together representatives of the EUD, UNODC and MNBP. This is a standard approach in many donor-funded projects. Despite its name, the PMC had no management authority: the UNODC line management for the project team at CONIG was – logically – purely internal to UNODC, and neither the EUD nor the MNBP representatives on the Committee had management authority on the project

---

donors once senior UNODC management had signed off on it and implementation risks had been identified and mitigated.

[12] It should be noted in this regard that the project, together with other projects implemented by CONIG on Justice and on Drugs, included in its budget and staffing table support for Headquarter administrative and professional staff.

(the CONIG representative being part of the internal line management). The Committee was in effect an information exchange and monitoring forum, but had no mandate to manage the project in any substantial manner. Also, the PMC met only once or twice per year, and did not meet at all in 2014. As a result, it was not able to keep timely tabs on the project's progress or to remedy the lack of efficiency that stemmed from substantial delays in the implementation of planned activities.

- **IT services component not implemented.** According to project documents, over one third of the project's original budget (about US$11m) was devoted to a substantial effort to upgrade the IT capabilities of the ACAs, including the provision of new hardware, software developed by UNODC, as well as training, technical assistance to the ACA IT staff, and initial maintenance. The basic idea behind the IT component was that it was necessary for ACAs to be able to share information quickly, through computer systems that were secure, used up-to-date software, and were compatible across all ACAs. This included upgrading the goaML software (designed to help agencies fight money laundering, and initially deployed in Nigeria as part of the 9th EDF project) and also developing an intelligence-sharing system known as go INTEL.[13]

   To deliver this part of the project, UNODC had to use an internal process known as a Service Level Agreement (SLA). The SLA serves as a formal agreement between the relevant Office (CONIG in this case) and the Information Technology Service (ITS), Division for Management on services to be provided by ITS over a specific period of time and for a specific amount. Nevertheless, EU deemed parts of the SLA[14] not eligible under the grant contract and the IT services component of the project could not be implemented as planned. The evaluators detected a degree of disappointment among ACAs about the fact that the IT hardware and software that they had originally understood would be provided, could not be delivered (they nevertheless widely praised the IT support they did get, though this was more limited than they had hoped).

Interviews and project implementation reports show that the project could have been substantially more efficient – in management terms rather than value for money terms, provided the following steps had been taken:
- High-level vetting and sign-off of the original proposal, resulting from an in-depth risk analysis at Headquarters level.
- Establishment of a project team at CONIG in Abuja bringing together staff with appropriate substantial/policy *and* administrative expertise, in sufficient numbers to address the intensive rhythm of activities required.
- Recruitment of a project manager with experience of managing projects of a similar size and appropriate seniority, with sufficient internal UNODC experience.
- Close monitoring of project progress by UNODC senior management, at least in critical phases.
- Revision of the mandate of the Project Management Committee, ensuring that its findings are brought directly to the attention of senior UNODC managers, EU Delegation representatives and MNBP officials, when deemed appropriate by PMC members.

_____

13 These systems are part of the "go family" of software products ("go" stands for "government office") developed by UNODC to support Member States in a range of relevant programme areas. In addition to upgrading goaML, the project intended to provide ACAs with goCASE and goINTEL, respectively case management and intelligence-sharing systems. Descriptions of the systems are available online: http://goaml.unodc.org/goaml/en/products.html

14 The specific parts of the SLA that were deemed ineligible concerned ITS staff costs.

Partnerships and cooperation

Interviews and document analysis showed that the project's partnership and cooperation arrangements were relevant and effective, in the sense that they helped ensure that the project performed well under each of the evaluation criteria and that they helped enhance its overall impact. While formal agreements (referred to as "compacts") between CONIG and ACAs will lapse at the end of the project, it is likely that the partnership and cooperation with them will continue, in a different form, beyond the project period.

The project mainly involved partnerships at three levels, as follows:

(a) **Between CONIG and the beneficiary ACAs.** This was the key set of partnerships, since it underpinned the feasibility and overall structure of the project. This set of partnerships was particularly solid, sustained by mutual respect and understanding, and a long record of interaction. CONIG had worked with the ACAs before the project started, and had acquired a detailed knowledge of the mandate, functions and operational approach of each of the ACA. Conversely, the ACAs – which all had a focal point dealing with CONIG – also developed a good understanding of the mandate and activities of UNODC – not just as a project partner, but also as the custodian of UNCAC and therefore a permanent interlocutor for ACAs, beyond the project period. An important element underpinning the quality of the partnership between the ACAs and CONIG is related to the competence of the project team: the team members tasked with liaising with the ACAs have gained widespread respect from their ACA counterparts.

(b) **Between CONIG and UNDP.** This relationship was established to implement the CSO component of the project. This was also an effective relationship, in the sense that the two organisations' areas of expertise were complementary, UNDP having a long experience of work with CSOs – mapping of organisations, training and other forms of capacity building. Also, UNDP was experienced in the process of grantee selection. This complemented UNODC's expertise on fighting corruption. This partnership was therefore instrumental to the effective implementation of the component.

Could the component have been implemented by CONIG alone, without UNDP? The evaluation shows that this could have been possible in theory, had the CONIG project team recruited staff to implement the CSO component. However, it is not clear that CONIG could have matched the accumulated experience of UNDP, which helped ensure that training sessions were made as relevant as possible to the beneficiary CSOs, and that grantees were cogently selected.

The only drawback of the arrangement was that the CSOs involved in working towards Outcome 3 – and the UNDP CSO team itself – operated in some isolation from the rest of the project. Although CONIG and UNDP project teams met regularly to plan work and take stock of activities, and although one member of the UNDP team had worked with CONIG previously, the CSO component was not explicitly and systematically made to interlink with the other two components. This could have been done, for example, in relation to the media and awareness raising work, and to some of the policy-related activities, of Outcomes 1 and 2. Nevertheless, it is important to highlight that this relative lack of synergy between 3, 2 and 1 did not hamper the effectiveness of Outcome 3 itself.

(c) **Between CONIG, the EU Delegation and MNBP.** The EU Delegation had a donor relationship with the project team, which was managed by staff from the Delegation's Operations Section. The EU was also represented on the Project Management Committee, alongside CONIG and MNBP. The relationship was appropriate for the purpose of project monitoring, but the PMC did not have the mandate to manage the project, and specifically to take action in case of necessity. The FGN rarely asserted its role as the national authorizing officer of the project.

Interviews in Vienna and Abuja indicated that the relationship between the EU and UNODC also had a political cooperation dimension, independent of the purely project-related partnership. Interviews with stakeholders at UNODC indicate that this political relationship was less intensive during the project than it had been, according to them, during the 9th EDF project. This was due in part to staff turnover and in part to administrative and logistical problems with project implementation, which delayed activities and appear to have led, over time, to a degree of loss of trust between the two sides, during the first two years of the project.

Could the partnerships have been stronger? Those with the ACAs were appropriate, but the project could have done more to foster more networking between ACAs and CSOs, particularly the ten CSO grantees. The project would also have benefited from a closer political partnership between CONIG the Delegation and MNBP: this did not emerge, largely – according to interviews – as a result of the administrative and logistical difficulties experienced early on by the project, and of staff turnover. Establishing more formal and regular consultation mechanisms between UNODC and the EU Delegation may be a good way to prevent such difficulties arising in future.

Effectiveness

Overview

On the basis of the desk analysis and field work, the evaluators found, in general terms, that the project, as revised after the MTE in 2015, was effective in the sense that many of the activities and of the outputs included in the revised plan were achieved. Nevertheless, delays in the achievement of some results hampered the effectiveness of the project with regard to some ACAs.

According to the reviewed logical framework, a majority of the outputs have been completed. If implementation had commenced as scheduled, all activities would have been completed and targets met and even surpassed by the end of the project. In some instances though, the targets were surpassed.[15] Nevertheless, the project was over-ambitious in its expected results. Some of the indicators provided, particularly in the initial version of the project document, were also over-ambitious, especially in view of the complex political context in which the project was implemented.

Activities and results

---

[15] The target number of UNCAC self-assessment conducted was 1 but 2 were conducted; 2.The target for new empirical research on corruption in Nigeria was 2 but 4 were produced; 3. The target of AC legislative proposals was 5 but 6 were developed. 4. Over 3000 individuals were trained across the 14 ACAs.

Project reports showed that the project activities were implemented mainly at the federal level but included stakeholders from across the country. For outcomes 1 and 2, the specific beneficiaries were all entities directly involved in generating information and analysis and those applying the resulting evidence base to policy planning, law enforcement and institutional cooperation. The beneficiaries under outcome 3 were initially a range of Nigerian CSOs working on anti-corruption issues, and in a second stage the ten CSOs that were selected in 2016 across the country to receive project grants.

In the first two years, the project did not produce all its planned outputs within the original foreseen timeframe, partly because some activities under outcome 1 were related to the NACS, and partly because of organisational, managerial and administrative problems noted above in the section on efficiency. Similar delays impacted the implementation of outcomes 2 and 3, though these could be implemented to some extent irrespective of the NACS being adopted. The original logical framework was technically very clear but it was also over-ambitious: it tried to address almost all key aspects of UNCAC implementation and included very ambitious indicators – for example the suggestion that the project could result in improving the public perception of corruption in Nigeria. The logframe was revised as a result of the MTE, with amended outputs and indicators (outcomes were unchanged), making it generally much more achievable – though still ambitious in view of the relatively short time remaining for implementation (less than two years).

Against the revised logframe, the project achieved a substantial degree of effectiveness. It is to be noted that some achievements were sometimes difficult to identify as a result of reporting procedures that were not thematic. For example, substantial work on extraditions was done – involving legislation, legal procedures and training – but each piece of work had to be reported under a different logframe output, thus obscuring the overall thematic achievement.

In terms of capacity building, progress reports of the project suggest that many of the activities were useful to the project beneficiaries. This was made clear from focus group meetings and from consideration of the content of the training sessions and mentoring activities, and from meetings with senior ACA officials.

Key milestones achieved in project implementation include (but are not limited to):
- Revival of Inter-Agency Working Groups, in accordance with the OGP principles, under the IATT platform and aimed at promoting joint operations and inter agency cooperation, on investigation and prosecution; asset recovery; prevention; research and policy; safe reporting; and media and communication.
- Regular ACA project focal point meetings to further exchange on their respective activities and increase mutual awareness of their respective mandates, share good practices and explore areas of additional cooperation.
- Support to the UNCAC review process, including review of anti-corruption related legislation in Nigeria and support for Nigeria's self-assessments and follow up of recommendations on the implementation of UNCAC.
- A series of assessments and research activities, culminating in a household survey providing a systematic overview of the extent of bribery and of the perception of corruption by the population (see below).
- Development of an anti-corruption data manual.
- Building capacity to draft and review a series of draft bills, including the Extradition Act (Modification) Order 2014; and to produce regulations such as the Extradition Act (Proceeding) Rules, bringing Nigeria closer to compliance with UNCAC.

- Capacity building in reviewing and drafting legislation concerning the fight against corruption.
- Technical support to national agencies for the drafting of an amendment to the Extradition Act 1967
- Support provided for the Extradition Act (Proceeding) Rules 2015 and the Sentencing Guidelines for Corruption and Related Offences 2015, which were signed by the Chief Judge of the Federal High Court.
- Support provided for the Code of Conduct Tribunal Practice Direction, 2017
- Technical advice, mentoring and training across all ACAs.
- Provision of hardware and software to selected ACAs to facilitate investigation, handling of petitions, case management and learning (e-library system), and provision of related training.
- Capacity building for CSOs in project management, analysis of corruption, awareness-raising techniques, etc.
- Grants to 10 CSOs for work on anti-corruption, mainly focused on awareness raising.

In as much as the project design was broad with objectives that appeared ambitions, the effectiveness of the project was primarily a function of innovations deployed in implementing the project. Generally, the project contributed in improving awareness among ACAs about practical collaboration approaches when fighting corruption. The Media Working Group of ACAs gave the institutions the opportunity of enlightening the citizens and getting feedbacks from them through anti-corruption radio programmes that were supported by the project.

Effectiveness at component level

Based on the revised logframe, the objective of **Outcome 1** was "Strengthened anti-corruption policy-making, coordination, research, monitoring and legislation, in line with UNCAC". On the basis of verified evidence and interviews with beneficiaries, the project has contributed positively to strengthening anti-corruption policy-making, coordination, research, monitoring and legislation, in line with UNCAC. The table below reviews key achievements under planned output.

OUTCOMES	OUTPUTS
1.Strengthened anti-corruption policy-making, coordination, research, monitoring and legislation, in line with UNCAC.	- Federal High Court Sentencing Guideline 2015. - FCT High Court Sentencing Guideline 2016 - Extradition Act (Modification) Order 2014 passed and gazetted. - Federal High Court Extradition Proceedings Rules 2015. - FCT High Court Practice Direction, 2017. - Harmonization of the approved and adopted National Anticorruption Strategy. - First Stakeholders' meeting on the implementation of the NACS. 32,000 household survey on experience of corruption. - Anti Corruption Data Template – (The Six, one day monthly meeting is still ongoing).
1.1:Enhanced inter-agency anti-corruption policy and coordination mechanisms in line with UNCAC.	Signing of a Cooperation Agreement by the heads of 12 Anti-Corruption Agencies (ACA). The MoU sets standards and modalities of cooperation and

	establishes the foundation for improved inter agency cooperation. • Establishing a series of Inter-Agency Working Groups, under the IATT platform and aimed at promoting joint operations, namely on Investigation and Prosecution, Asset Recovery, Prevention; Research and Policy; Safe Reporting and Media and Communication. • Regular Focal Point Meetings for ACAs to further the exchange on respective activities and increase mutual awareness of their respective mandates, share best practices and explore areas of cooperation. • 3 UNCAC review on Nigeria and related follow up throughout the project – 2013, 2014, 2017 (Chapters II (Prevention), chapters III Criminalisation and Law Enforcement and IV International Cooperation) and V (Asset Recovery). • Support for the 2012 and 2013 International Anticorruption Day under the platform of IATT. The project supported the implementation of some activities – (1) The convening of a high-level workshop in Abuja; (2) implementation of a sub-national event in Akwa Ibom state, which included talk shows, a rally and a round-table discussion; (3) awareness-raising activities included a schools' debate involving eight schools from across the FCT and a photo competition entitled "Images of Corruption" which ran on social media for thirty days and reached over 1000 youth across the country.
1.2: Improved research service capacities that facilitate an evidence-based approach to anti-corruption policy.	• Household Corruption Survey and Report. • Report on bibliography of Corruption and presented to the Vice President of Nigeria. • Corruption Risk Assessment on E-Government. • Cases and materials on Extradition in Nigeria. Report has been published. • Based on the 2015 Annual Project Progress Report, the project organized an International Anti- Corruption Research and Policymaking Conference on 26 – 27 October 2015.
1.3: Strengthened legislative drafting capabilities aimed at the development of anti-corruption laws that are in line with relevant regional and international standards, including UNCAC.	• Technical advice and capacity building on reviewing and drafting legislation – Access to Asset Declaration of Public Officer Bill; Public Procurement Act Amendment Bill, NEITI Act (Repeal and Re-enactment) Bill; Administrative Justice Bill; Proceeds of Crime Bill 2016; Establishment Act Amendment Bill 2016; and Bribery of Foreign Officials Bill. • Capacity building on legislative drafting and analysis.

The objective of **Outcome 2** was "Institutional and operational capacity of anti-corruption agencies enhanced and inter-agency cooperation improved". This was achieved, largely on the basis of joint training and media work, together with the provision of equipment (computers, access to online libraries) and support to enhanced cooperation among ACAs, including on extraditions requests procedures (complementing work in this field implemented under Outcome 1). Interviews with ACA senior officials and staff demonstrated the value to them of the mentoring and training activities, which they valued both in terms of the acquisition of technical knowledge – for example on ethical decision-making – and in terms of generic skills (research, policy development, organizational development), which the ACAs are likely to need on an on-going basis.

OUTCOMES	OUTPUTS
2.1 ACAs supported to develop institutional strategies, based on management reviews, including standard operating procedures, codes of conduct, etc.	• Development and implementation of strategy documents, such as ethical decision-making guidelines. • Development of standard operating procedures on extradition requests
2.2: Strengthened corruption prevention capability of relevant ACAs, based on improved specialized skills, tools and procedures.	• Provision of mentoring (on-going technical advice) to key ACAs. • Training of at least 500 ACA staff on corruption prevention, reporting and investigation.
2.3: Anti-corruption law enforcement capabilities developed, with a focus on intelligence, investigations, prosecutions and adjudication.	• Provision of training on anti-corruption research and investigation, use of online tools. • *This sub-component was the most adversely impacted by the non-implementation of the IT support services envisioned in the original project document.*
2.4: Strengthened capabilities of ACAs in raising public awareness on AC.	• Training of ACAs on media work and advocacy strategy (message development, targeting and monitoring of public feedback, including through social networks). • Support to contribution by ACAs to regular radio programme, and to other media initiatives.

As noted in the above table, the outcome suffered substantially in its implementation from the fact that the IT services component of the original project could not be implemented as originally envisioned by UNODC staff. This component, according to CONIG staff, would have helped ensure that the participating ACAs have access to an effective, secure and up-to-date system (hardware and software) to ensure communication and information-sharing amongst ACAs, in accordance with their respective policies and mandates, and safeguarding the need for confidentiality of information and for the protection of individual data. As this assistance could not be forthcoming, the component was in practice pared down, with a focus instead on institutional development and staff skills development in areas other than IT.

With regards to CSOs (**Outcome 3)**, the project helped ensure they were empowered to increase the provision of services and their participation in anti-corruption activities. There is evidence in interviews and project progress reports of effective project planning in relation to the CSO empowerment component of the project, of strengthened CSO capabilities, of a functional grant scheme, and of enhanced CSO networking and advocacy in relation to the

fight against corruption. In the light of the foregoing, the effectiveness of the project can also be associated with the ten CSO grantees, which used project support to implement a range of anti-corruption projects. Other projects likely to achieve substantial results focused on issues such as monitoring the implementation of local budgets. This involved, for example, developing the skills to obtain information on local budgets (often released only reluctantly by local authorities) and the expertise to analyse the budget lines. In addition, some CSOs visited the site of government-funded development projects, to ensure that they were actually taking place in accordance with budget plans.

Planning

Interviews with the project team showed that one of the challenges faced by the project, which impacted its effectiveness, was related to the planning of activities. As noted above, the overall workplan provided in the project document was of a general nature, and was not broken down into activities. The actual activities planning took place through annual consultations with the ACAs. These were time-consuming and the process of consultation was itself a cause of delays in activities. One underlying issue is that the multi-year planning horizon of the project differed from the ACAs' own planning horizon, which was limited to one year, due to the annual budget cycle in Nigeria.

Visibility and communication

The project developed a visibility strategy in consultation with the EU Delegation. All activities implemented included visibility components. A communication strategy was also developed, with the aim of raising public awareness of various aspects of the fight against corruption, mentioning the EU's financial support for the project. The following visibility techniques were used:

1. Jingles bearing EU sponsorship of the project ran on the weekly "Anti-Corruption Hour" radio magazine programme designed to showcase the work of the ACA beneficiaries.
2. High profile events with extensive media coverage, both before and during events: PACAC meetings with the President ('The Role of the Judiciary in the Fight Against Corruption), the Vice-President ('The Role of the Legislature in the Fight Against Corruption'), etc.
3. Commemoration of the annual International Anti-Corruption Day (9 December). In 2016 for example, the commemoration included a primetime special national radio broadcast featuring the EU's Deputy Head of Delegation and UNODC's Representative in Nigeria.
4. Participation by Nigeria in international meetings also provided opportunities for Nigerian delegations to credit EU support for progress made in the fight against corruption.

The MTE had recommended the development of an inter-agency anti-corruption communication strategy. This was essentially implemented in the form of the "Anti-Corruption Hour" radio programme: as part of the achievements recorded under the project visibility, the 2015 annual report noted that a Working Group on Media and Communication was set up and began meeting in the third quarter of 2015, and with the support of the project was able to produce and air a weekly radio magazine program – "Anti-Corruption Hour". There is also scope for further development of a communication strategy as part of the newly adopted NACS.

The visibility created by the project was two-pronged:
- The project gave visibility to the beneficiary ACAs and CSOs grantees. Project progress reports and interviews showed that this was achieved through the radio programmes and anti-corruption messages disseminated via social and traditional

media. According to the beneficiary organisations, more citizens now know what agencies like SCUML, ICPC, CCB, PCC, NEITI, and organisations like Akin Fadeyi Foundation, etc., stand for and their mandate/focus, unlike before the project intervention when a lesser population knew about them. This visibility is much appreciated by the project beneficiaries.

- The second prong is that the visibility activities as observed during the evaluation, highlighted the aims and achievement of the project, the contribution of the EU, the contribution of the implementing agencies (CONIG and UNDP), and the contribution of the CSOs and ACAs to the fight against corruption, including through the output of ACAs and including through the use of a visual identity for the project. The visibility of EU and UNODC was clear from inscriptions on the equipment (laptop and desktop computers, Hilux vehicle), law books donated, and other physical items provided by the project. The anti-corruption radio programmes of the working groups acknowledged the EU and UNODC as sponsors, and similarly, the audio and visual anti-corruption messages, and printed materials by the CSOs grantee also did same acknowledgement.

The visibility activities addressed all the target groups listed in the visibility strategy: ACAs (primary target group); Government, media, donors and others (secondary target group); and the population at large (tertiary target group), with messages that were relevant to each group. The visibility strategy included online outlets too, especially through the online publicity given to activities of some of the CSOs grantees of the project.

Impact

It is somewhat premature to refer to the impact of the project as a whole, partly because impact may appear some time after a project's end, and partly because many activities have been concentrated in the final two years of the project, and are being completed at the time of writing. Nevertheless, the evaluators were able on the basis of interviews and document analysis to identify *elements of impact*, patterns or attitude changes that are likely to influence future anti-corruption activities in Nigeria. With the ushering in of a democratic dispensation in 1999, anti corruption agencies were established[16]and notable convictions of high profile persons were recorded.[17]Building on this background, the project supported the government of Nigeria by promoting good governance and by contributing to Nigeria's efforts in enhancing transparency, accountability and combating corruption.

The evaluation shows that the project is likely to achieve some positive impact in terms of institutional and CSO capacity to fight corruption, and in terms of staff skills and competences. The project is also likely to contribute to a continued change in attitudes, away from a sense of fatalism about corruption being inavoidable and towards specific actions being taken at all levels to prevent and fight corruption.

_____

[16] The Independent Corrupt Practices Commission and Economic and Financial Crimes Commission.

[17] Former Inspector General of Police, Tafa Balogun and Former Governor of Bayelsa State, Late Diepreye Alamesiegha

The project further deepened and reinforced the discussion around corruption with the realease of the household survey, the first of its kind in terms of scope and scale, by providing a baseline measure of the extent of retail corruption in Nigeria and its far reaching impact on citizens when in contact with public officials. The result of this survey will likely in the long term help in steering future policy direction for Nigeria in the fight against corruption. Through the project, UNDP was also able to conduct an assessment and mapping of civil society organisations in 17 states of Nigeria. This exercise has led to the development of a database of organisations that work on issues pertaining to accountability and transparency across the six geopolitical zones of Nigeria. This is a rare comprehensive document that has put together information and resources that were previously disaggregated or not available, and was used to select the CSO grantees.

The evaluators did not identify negative or unintended impacts, except to some extent in relation to unfulfilled expectations, on the part of ACAs, in relation to support for the development of IT systems. The evaluators detected a degree of disappointment among ACAs about the fact that the IT hardware and software that they had originally understood would be provided, could not be delivered – they nevertheless widely praise the IT support they did get (see above, discussion of Output 2.3), though this was more limited than they had hoped.

Elements of overall impact

These elements of impact have mainly been identified through interviews and are related to the following outputs and outcomes:

(a) Legislation, regulations, guidelines and operating procedures, as detailed above in discussion of Output 1. The project included a substantial amount of drafting and advisory work in the legislative and regulatory fields. This is lengthy work requiring extensive consultations with stakeholders (and sometimes involving UNODC Headquarters and outside experts). However, once adopted, such texts typically have a long shelf life and contribute to changing attitudes among experts and members of the judiciary, as they enter teaching curricula and other forms of training, thus becoming part of the anti-corruption framework.

(b) Research and studies. The project also had a substantial element in this regard: the household survey published in July 2017, though delayed, was the first of its kind (and of its scale) in Nigeria – and indeed in the whole of Africa – providing a baseline measure of the extent of corruption as experienced by ordinary citizens, based on internationally recognised social science methodologies. Other studies – on prevention, ethical decision-making, etc. – are also likely (if appropriately disseminated and followed up, as planned by the ACAs concerned) to contribute to an improved understanding of corruption mechanisms in Nigeria, and therefore also to strategic change.

(c) Training, mentoring and technical advice. The project included a substantial element of training on a broad range of topics for ACA members (see discussion of Output 2 above), and some ACAs also benefited from targeted mentoring support by senior experts. Taken together, these actions are likely to contribute to further developing the skills of a critical mass of intitutional experts, and therefore to laying the groundwork for enhanced momentum in the fight against corruption.

(d) CSO support. Activities included training on project management and anti-corruption techniques for a range of local and CSOs, as well as project grants to ten selected CSOs around the country. This component too may lead to strengthening awareness of corruption (and remedies) in Nigeria.

Impact on beneficiaries

The project is likely to impact the project beneficiaries, through knowledge acquired by ACA staff and through the use of software[18] and hardware[19] deployed as part of the project. The immediate effects of the project as observed during the evaluation indicate that:

- The project activities and outputs have enhanced the participation of CSOs in policy and political debates at local level on the fight against corruption, as well as the visibility of their advocacy.
- The project activities have also brought ACAs together[20] both as institutions and as colleagues within institutions. The project has been able to bring together all the ACAs, thus following up on a strategy initially developed during the 9th EDF project.
- Activities such as mentoring helped to strengthen teamwork among the mentees that benefited despite their work demand during the mentoring period.
- The quality of feedbacks received especially during the radio programmes has helped institutions like NEITI to improve on their products and services and also in addressing issues concerning the Department of Petroleum Regulation (DPR) and the Nigeria National Petroleum Corporation (NNPC).
- The training on developing strategic plans was particularly impactful, in that institutions such as NEITI attested that trainees/mentees from the institution were fully involved in developing NEITI's Strategic Plan of 2017 – 2021, which ordinarily would have been outsourced to external consultants to develop. Likewise, the project assisted in the revision of issues identified in the BPP compliance procedure. And CCT Practice Direction came to reality as a result of the project support.
- The training on legal drafting has also improved the skills of the beneficiaries across the ACAs, and the training has made beneficiaries to be more proactive rather than reactive in carrying out their duties.
- The development of omnibus software (self-assessment checklist) has helped in sharing of information between the ACAs and the Ministry of Justice on the one hand, and foreign counterparts on the other (despite some language barrier problems). This software is said to be well utilized by IATT members.

Legislation and policy debate

It is important also to note that part of the consultation process on the Administration of Criminal Justice Act was facilitated by the project. Other bills were drafted in part with the support of the project, although these bills are yet to be passed into law by the National Assembly. PACAC in collaboration with relevant stakeholders, through the support of the project, interfaced with the legislature in ensuring that the following four bills were finalized and forwarded to the National Assembly:

- Whistleblower Bill
- Proceeds of Crime Bill
- Witness Protection Bill
- Public Procurement Amendment Bill

---

[18] These included: e-law library, Analytical tool for forensic, goCASE management system, "Sentinel" Visualizer, anti-corruption portal (data collection template for incidence of corruption), etc.

[19] Including: law books, laptops, desktops, servers, etc.

[20] There is now a high level of cooperation among the working groups, unlike before the project intervention.

Institutions like the Ministry of Foreign Affairs now leverage the existing coordination among the ACAs to get information from different ACAs for use in international fora.

The project supported CSOs' development of tools creating awareness on issues of corruption[21]. Before the project intervention, CSOs especially those at the sub-national level, were less involved in policy engagement without proper coordination[22] in the fight against corruption. The project also helped CSOs to further understand the complexity of the fight against all aspects of corruption.

Through training on project development and management, and by supporting a coordination body, the project encouraged the formation of CSO coalitions, which may lead to more CSO engagement in policy debates regarding the fight against corruption. Similarly, the project created platform for the CSOs and agencies like CCB to work together in developing a bill that on asset declaration.

Based on interactions and interviews with beneficiaries, there is evidence of enhanced inter-agency coordination, strengthened research based policies development and legislative reforms, improved empirical research capacity, and enhanced legislative drafting capacity among ACAs.

ACA attitudes and work
During interviews with various respondents who benefited from the project as to the extend at which the project outputs and activities was useful to their work and their agencies, the following were noted.

- The project exposed staff to various useful trainings, development of standard operating procedures and training of trainers which has assisted to upgrading their agencies' tools for planning and equipped them with modern trends on issues of anti corruption.
- The project enhanced the visibility of the agencies through its various media campaign and also assisted in educating the public on their individual activities.
- The project enhanced capacity in the collation and analysis of data; improved ability to draft legislative bills and policies and interpreting statutes. As a result, a bill on "Promotion of Just Administration and Regulations" has been drafted.
- The project enhanced collaboration and information sharing amongst ACAs through cooperation MOUs.
- The project enhanced performance towards record management and updating of records; improved on the duties of Anti –Corruption Transparency Units; enhanced and fostered cooperation between Nigeria and other nations who have signed the Extradition Act; and strengthened the delivery of justice by the development of the FHC Sentencing Guidelines for Corruption and Related Offence 2015.
- The project also procured 1310 books for the FHC, which has assisted in research by judges and research assistance across the 37 division of the FHC, and enhanced the capacity of investigators and prosecutors.
- ACA staff members interviewed by the evaluators have stated that training helped them develop their research skills; gain gained experience in developing sector specific policy briefs and in drafting legislative bills and analysing legislations.
- ACA staff also told evaluators that they acquired enhanced skills in developing Standard Operating Procedures and learned modern trends of handling issue of anti corruption.

---

[21] Some CSOs activities focused on issues on procurement, yet there was little or no interface between the beneficiary CSOs and the relevant ACAs working on procurement.
[22] There was a lack of effective coordination among CSO grantees, particularly in terms of sharing information about their use of the project grants.

Sustainability

The evaluation shows that the project had substantial elements of sustainability, in the sense that skills, organisational principles and processes were developed or improved, which helped ensure continued improvement in the fight against corruption. The sustainability strategy under the project was based on the principles of ownership in line with the Paris Declaration on Aid Effectiveness. Therefore, under the project design, provision was made for the project to assist beneficiary agencies with the development of their own strategy or development plans as a first step in the support to them. Where such plans and strategies already existed, project interventions was in direct support of ACAs' policies and strategies, while building at the same time their management systems, mechanisms and procedures.

One substantial contributor to sustainability was the mentorship approach, largely developed as a follow-up to the MTE. The main feature of the approach was that an outside expert, the mentor, was available full-time for a period of 60 days, to assess a particular ACA's situation and address its identified need in a particular area of specialisation – organisational development or thematic issue such as corruption prevention. The mentors worked with ACA staff so that the staff themselves analysed needs and addressed them, thus helping develop practical skills of policy development. The mentees that benefitted from the project and met with evaluators were invariably enthusiastic about the result of the approach, and had clearly been highly committed throughout their training. They showed enthusiasm to follow up the recommendations from research on anti-corruption using the IATT platform. In addition, the evaluators have identified the following elements of sustainability of the project:

- The project built upon existing anti corruption policymaking by enhancing the capacity of the various ACAs through mentoring on the development of agency specific policy briefs. Most importantly, the newly-adopted NACS (2017 – 2021) will likely benefit from the outcome of this mentoring, in that the NACS specifically states that "to ensure effective and efficient mainstreaming of the spirit and letter of the Strategy into all facets of the society and public life, it will be aligned to sector-specific strategies which address the peculiarities of each sector while ensuring a holistic approach".[23] This is the approach that mentoring was seeking to encourage.
- The project improved the legislative framework on extradition and sanctions by providing a substantial amount of drafting and advisory support in the legislative and regulatory field which lead to the development and passage of the Federal High Court Sentencing Guideline 2015, FCT High Court Sentencing Guideline 2016, Federal High Court Extradition Proceedings Rules 2015 and the Extradition Act (Modification) Order 2014. Obviously, the immediate effects of these frameworks can only be measured by their implementations, which is yet to be greatly felt.
- According to a respondent, one of the identified challenges with the utilization of the Federal High Court Sentencing Guideline 2015, is the existence of "irregularities", or inconsistencies, within Nigerian laws, which make sentencing difficult. However, according to two different respondents, the Extradition Act (Modification) Order 2014 has actually been tested by a judge but it is not clear whether the invocation of the act was successful or not. Nevertheless, the fact that it was indeed tested is to be taken as a positive sign. Also, according to a UNODC presentation delivered at the PMC meeting on May 30th

---

[23] National Anti – Corruption Strategy (2017 -2021) at page 15 (Unpublished)

2017, adoption of the FCT High Court sentencing guidelines inspired Cross River to adopt its own similar guideline, which is a good trend.

- The project also enhanced the developing area of research-based data on corruption through the household corruption survey, and the provision of e-library access on corruption research reports, corruption risk assessments, information on e-government and case material on extraditions in Nigeria. These data will enhance the quality of research carried out in the area of anti corruption and assist in policy formulation.
- The project, as mentioned above, also helped enhance coordination, efficiency and cooperation between the ACAs through MoUs, coordination Focal Points meetings, various working group, support to IATT working groups, and joint activities. The immediate effect of all these is that it has familiarized the ACAs with each other, not only at management level, but also at the working level. It has facilitated the exchange of information, request sent to agencies are responded to promptly and this was not the case in the past as ACAs were used to stonewalling each other.
- The project also facilitated monitoring through harmonized data collection across ACAs by the development of a data template. The template was designed to address the gap in anti-corruption data collection identified in the 2014 UNCAC review on Nigeria. Even though the use of data template is still at its test stage, some ACAs have populated their template and have successfully synchronized it with the National Bureau of Statistics' server.
- Other forms of coordination and cooperation among the ACAs has also been fostered and is likely to be sustained, especially across the functional working groups like the media working group[24]. The activities of the media working group have been integrated into the public relation units of the ACAs as they continue media anti-corruption campaign in both the new (social media, online) and traditional (radio, print and television) media outlets and further engagement with institution like the National Orientation Agency (NOA).
- The CSO-related activities are helping CSO to establish organisational processes and acquire anti-corruption skills (research, campaigning, and advocacy) and coordination mechanisms that are likely to be used beyond the project period.

Could the project have achieved a greater degree of sustainability? In the absence of the IT services that were designed into the original proposal, it is difficult to see how sustainability could have been improved further, because the key driver in this respect is the organisational development of the ACAs and beneficiary CSOs themselves. In that sense, the project's endeavours to enhance cooperation among ACAs is the single most important element of sustainability, and this should be fostered in the future, including in on-going interaction between UNODC and ACAs on issues such as UNCAC implementation.

Human Rights

The link between the fight against corruption and human rights is complex. Far from being a "crime without victims" corruption hampers the exercise of fundamental human rights, and may lead to outright human rights violations such as torture, illegal detention or extra-judicial execution. Corruption has a deleterious impact on economic, social and cultural rights, and may worsen the situation of members of vulnerable groups.

_____

[24] The bringing together of all media units of ACAs is very innovative and it enabled media experts across ACAs develop common content for anti-corruption radio programmes.

In this context, the project appears to have contributed to the promotion and protection of human rights in the following – mostly indirect – ways:

- One basic tenet of the work done under Outcome 1 of the project was the need to reinforce due process in all aspects of the prevention and prosecution of corruption. This includes, for example, ensuring that legislation and regulations on extradition requests, such as those developed as part of the project, are free from discriminatory provisions and practices. This also includes the need to work on issues such as witness protection and other aspects of safe reporting, including whistleblower protection, as was envisioned and initiated as part of the project.
- In general terms, capacity building for ACAs, which contributes to the transparency and accountability of government institutions and to the operation of an independent judiciary, is consistent with international human rights standards. Specifically, some of the project activities – such as work on ethical standards of decision-making and the household survey – can in principle contribute directly to lowering the impact of corruption on ordinary citizens, thus helping Nigeria fulfil one of its UNCAC commitments.
- The project, by building the capacity of CSOs to address corruption, contributed to enhancing citizens' involvement in the fight against corruption and in the process of keeping government accountable. The grants to CSOs in such field as anti-corruption education also contributed to the long-term goal of protecting vulnerable people through rights-based development.

Gender

While corruption harms everyone, it may have a disproportionately adverse impact on women because they are, as a group, more vulnerable than men in socio-economic terms. Project documents and interviews with stakeholders demonstrated that the project took gender equality considerations into account, in its design and implementation. It did so in particular in the following ways:

- The numerous training activities conducted under the project systematically involved women as participants and sometimes also as trainers. While male training participants were in the majority[25] – reflecting the fact that ACA staff are majority male – there was clear evidence that women ACA staff, including senior management-level staff, actively participated in training sessions. During focus group meetings with the evaluators, women often took the lead in responding to questions.
- The Household Survey systematically included gender disaggregated data. This was particularly important because the traditional role of women as educators and their responsibility for children's health gave them specific insights on instances of corruption in the education and health sectors.
- Several of the CSO projects supported under Component 3 of the project were implemented by women-led organisations. Some concerned the field of education –raising awareness of corruption among schoolchildren and students – and others concerned the monitoring of local authorities' budget. In all these cases, the project fostered the role of women as agents of change against corruption.

---

[25] Reports from training sessions indicate that, on average, 60% to 70% of participants were male. The reports did not always specify participants' job titles, which made it impossible to crosscheck gender and seniority data. In the focus group meetings held by the evaluators at the NCPC and CCB, for example, women participants included senior management-level staff.

Innovation

Interviews with stakeholders showed that the project introduced a number of innovations, in the form of policy and legislative changes, and in the form of processes and systems to address various aspects of corruption. Some of those innovations are highlighted as case studies below.

- **Legal innovation.** The project worked with the Attorney General of the Federation and with the Federal High Court to devise an innovative process to address a legal loophole used by people whose extradition was sought by Nigeria. In a separate innovation, it also worked with the Nigerian Law Commission and the Federal High Court to develop sentencing guidelines (see overview below)
- **Process and administrative innovations.** The development of an anti-corruption data template for ACAs, which can also be used in tracking the implementation of the NACS, was described by ACAs as a useful innovation, encouraged by the project team. Other process innovations related to the project included:
  - Regular focal point and working group meetings of ACA representatives, which were described by interviewees as innovative platforms to foster and sustain relationships and share information amongst the agencies.
  - The Sentinel visualizer was also praised as a valuable technological innovation, despite the need to fix software issues.
  - The SMS Case Reporting application for PCC was also innovative (the development and configuration of the application were still on-going at the time of writing).
- **Household survey**. This was the first survey of its kind in terms of scope and scale, providing a baseline measure of the extent of corruption as experienced by ordinary citizens (see overview below).

The following are overview of key innovations supported by the project:

- **Support to strengthening Nigeria's legal framework for extradition.** Article 44 of the United Nations Convention Against Corruption (UNCAC) 2003 recognises extradition as one of the international cooperation tools useful in the fight against corruption. From 1 January 2012 to 17 June 2013, Nigeria received 19 requests for extradition, 6 of which related to corruption and money laundering. The 2014 UNCAC review of Nigeria identified inadequacies in the Nigeria's legal framework for extradition; these inadequacies included an ambiguity as to which court had jurisdiction to determine extradition requests. This was created by a conflict between the Extradition Act of 1967 and the Nigerian Constitution of 1999 (as amended), and people whose extradition was sought exploited this loophole.

  On average, these legal tussles added about two and half years to extradition proceedings because the jurisdictional ambiguity often led to multiple appeals. Another challenge identified was the unclear evidentiary and judicial procedures for determining extradition requests.

  Against the above background, the ordinary way to address the identified gaps would have been to draft a bill to amend the old Extradition Act of 1967 and present it to the National Assembly for consideration. Going by the history of the Nigerian legislative processes, this would have taken five or more years to accomplish – a period obviously outside the lifespan of the project. The project therefore provided technical advice and legal drafting support to the stakeholders (Attorney-General of

the Federation and the Federal High Court) to use two time-saving constitutional devices to achieve the same end:

1. Use of the President's powers to modify laws to conform to the constitution. This resulted in the Extradition Act (Modification) Order 2014, clearing the ambiguity on which court has jurisdiction to determine extradition matters.
2. Exercise of the powers of the Chief Judge of the Federal High Court, to make practice rules, resulting in the issuance of the Federal High Court (Extradition Proceedings) Rules 2015. This clarified evidentiary and procedural requirements for extradition proceedings.

From inception to completion, these two processes took only eight months in contrast to the longer time required for a legislative amendment, as well as the related savings in legislative costs. These two legal devices have been tested in court and are now in use.

- **Support to strengthening Nigeria's legal framework for anti-corruption sanctions.** Articles 26 and 30 of the UNCAC require state parties to ensure that legal and natural persons found guilty of corrupt offences receive sanctions commensurate to the offences committed. Though Nigeria had several laws criminalising a wide range of corrupt offences, there were no clear guidelines for administering appropriate sanctions. This resulted in disparities in sanctions applied for similar offences and consequently also resulted in an erosion of public confidence in the courts' ability to hold persons – especially politically exposed persons – accountable for corrupt practices.

  Before the project commenced, proposals had been pending for years to develop a bill for the establishment of a Sentencing Council, which would in turn develop sentencing guidelines or bills for the consideration of the National Assembly. Going by legislative history, this process would have required another five years or more of consideration by the National Assembly.
  The project provided technical advice and legal drafting support to the Nigerian Law Reform Commission and the Federal High Court, which resulted in the Chief Judge of the Federal High Court issuing the Federal High Court (Corruption and Other Related Offence) Sentencing Guidelines Practice Directions 2015. The subsidiary legislative device used in issuing the sentencing guidelines has become a good practice, which has been emulated by other Nigerian courts, including the High Courts of Cross Rivers State and Federal Capital Territory.

- **Household survey**. This nationwide survey of over 32,000 respondents concerning their experience of corruption was the first of its kind in Africa, and constituted a worldwide good practice model for this type of research. While UNODC had previously worked on similar surveys in other parts of the world (Afghanistan, Western Balkans, Iraq) this survey was unique due to its size and its focus on an African country.

  The Nigerian Bureau of Statistics (NBS) implemented the survey, using over 300 interviewers and several dozens supervisors, trained with UNODC support. UNODC research experts led the process of developing and testing the questionnaire, and carried out the analysis of the data obtained. The basic measure used in the survey concerned the use of bribery (demanded or provided) as a percentage of contacts with public officials, in 18 specific fields such as judges, teachers, doctors and paramedics in public health facilities, police, local government officials, etc.

Respondents were asked whether and when they had contacts with such public officials, whether bribes were requested or provided – and if so to whom, in what amount, and why.

The UNODC researchers used cognitive testing to ensure that the questionnaire was free of ambiguities in the formulation of questions, which were reworded where necessary to avoid misunderstandings or stigmatising words. A pilot survey was conducted in four states (Delta, Katsina, Kwara and Oyo) with about 500 interviews, testing different wording for various questions. The questionnaire was then finalised on the basis of lessons learned from this test period, taking into account the views of NBS staff and of the interviewers who had conducted the test in the field.

Following translation into Yoruba, Hausa, Igbo and Pidgin, the survey was done from April to May 2016, using portable electronic devices to register replies from those surveyed. This allowed for real-time checking of the survey process, and ensured that NBS could rapidly check back with interviewers in the rare cases when incorrect data entry or other concerns were detected. The interview process was led by NBS and monitored by a Lagos-based survey company, to ensure consistency and adherence to process guidelines.

As a result of this rigorous process, the data obtained was checked again and UNODC conducted the statistical analysis and interpretation of the results. This was subsequently checked with CONIG in Abuja and with NBS, and the eventual results were presented to the ACAs in July 2017.

The key learning from the survey was that patterns of corruption and bribery risks, as experienced by citizens across Nigeria, are different from those found in other countries. Whereas other countries report more corruption in schools, hospitals, etc., this was not common in Nigeria, where the highest rates of bribery occurrences were in contacts with police, judges, prosecutors, tax authorities, traffic management, etc. There was also different patterns in urban and rural areas. People in rural areas had fewer contacts with police and justice officials than people in urban areas. However, those rural dwellers that did have contacts with such officials faced a greater risk of bribery demands (hence a tendency to turn to traditional leaders to solve legal problems). People working in the informal economy (day labourers, etc.) were also shown to face a higher risk of bribery demands than those working in the formal sectors of the economy. The survey analysis concluded with a discussion of the policy implications of the survey, noting in particular the importance for Nigeria of developing and implementing whistleblower protection legislation and practices.

III. CONCLUSIONS

The following conclusions may be drawn from the evaluation:

- **The project was highly relevant**, in that it was based on a sound analysis of the situation of the fight against corruption in Nigeria, and addressed needs that were clearly in line with Nigeria's commitments under UNCAC.

- **The project approach was appropriate to addressing identified needs.** The approach based on three prongs was sound, with focus on policy development and coordination; ACA capacity building and coordination, and support to CSOs. However, **the set of outputs was over-ambitious.** The project sought to achieve a broad range of outputs in each of its three outcome components, leading to an original project design that was overly complex and calling for a range of activities that was not realistic in view of the then-prevailing political context.

- **The relevance of the project was weakened by successive changes.** The original project document was discussed with ACAs in 2012 and revised and once again in 2015. The revisions however led to widening the project's scope, instead of narrowing it.

- **The project was in line with Nigerian, donor and UNODC strategies.** The project was consistent with stated FGN aims and with the EU's strategy in Nigeria. It was also in line with UNODC's mandate as custodian of UNCAC, and more specifically as a repository of anti-corruption technical expertise.

- **The project team lacked sufficient coordination with the political staff of the EU Delegation.** Although the fight against corruption was clearly an EU strategic priority – and remains so today – the project team wasn't able to provide systematic, explicit input into the EU-FGN political dialogue on anti-corruption issues. As a result, full use was not made of the insights gained by the project team in the course of implementation.

- **The project's effectiveness was hampered by delays and missed opportunities.** In particular, there was insufficient delivery of planned outputs in the first two years of the project. Substantial efforts and management changes since 2015 have led to significant improvements in delivery. The cancellation of the bulk of the IT support component of the project was a missed opportunity to build capacity among ACAs.

- **Budget reporting was appropriate.** Despite initial administrative and accounting misunderstanding, the project team delivered clear, accurate and generally timely reports to the EU, demonstrating that funds and other resources were used in accordance with plans, as revised.

- **The project benefited from staff expertise, both at CONIG in Abuja and in UNODC Headquarters.** The project team members were highly skilled and earned respect among ACAs for the quality of their advice and expertise on anti-corruption issues. Other support staff – short-term experts and experts based in Vienna's UNODC Headquarters – have

also provided useful and timely advice, contributing to the project's overall effectiveness and impact.

- **Under-management hampered the project's effectiveness and efficiency.** The initial project managers lacked the seniority and experience that its size and scope required. Despite the undeniable expertise and commitment of project team members, and despite the substantial improvement in project management since 2015, support from UNODC Headquarters remained beset by delays, compounding challenges to the delivery of outputs. Administrative difficulties, external events and procedural issues compounded the delays and hampered the overall delivery of project activities.

- **The project is likely to achieve some impact by contributing to changing attitudes, reinforcing political will and enhancing the skills of those fighting corruption.** The substantial work done to reinforce the legislative and regulatory framework of the fight against corruption, as well as the critical mass of participants in training sessions, are likely to enhance readiness among institutions to fight corruption.

- **The project benefitted from effective partnerships and cooperation.** The cooperation between CONIG, EU and ACAs, as well as with MNBP, helped deliver project activities to a substantial degree, thanks in particular to the complementary skills of CONIG and UNDP. – although the CSO component was insufficiently integrated with the other two. The partnership with the EU was insufficiently focused on the political aspect of the project (as opposed to its project reporting procedural aspect).

- **Support to CSO projects is likely to reinforce the monitoring of state budgets and citizens' involvement in the fight against corruption.** The 10 CSOs that have received grants from the project, via UNDP, appear likely to achieve most of their anticipated goals, which would go some way towards enhancing the accountability of local authorities in target areas.

- **The public awareness activities by ACAs and CSOs contributed to raising the profile of the fight against corruption in Nigeria.** The ACAs' Media Working Group has devised and implemented an appropriate public awareness strategy, which has effectively highlighted the various aspects of the fight against corruption – from prevention to whistleblowing and prosecution. This also contributed to some extent to the visibility of the project as a whole, and of the EU as a donor.

- **The project's sustainability lies in legal and regulatory changes, acquired skills and capacity, enhanced networking and dialogue between government institutions and civil society.** These elements should be reinforced in future. An explicit exit strategy is lacking at this point, but the capacity exists to develop one in the final weeks of the project.

- **The project included a number of elements that indirectly contributed to the protection of human rights.** The project helped foster the rule of law and the effective functioning of the judiciary. It addressed legal loopholes that weakened the fight against corruption. It supported a greater degree of civil society involvement in the fight against corruption. These elements are all consistent with Nigeria's commitments on human rights and on anti-corruption.

- **The project included elements of substantial innovation.** These were in particular related to the amendment of legislation and the development of guidelines within the judiciary on matters related to the fight against corruption. Another substantial piece of innovation was related to the Household Survey of citizens' experience of corruption, a significant milestone in this field of research.

IV. RECOMMENDATIONS

On the basis of the findings and conclusions of this report, the evaluation team formulates the following recommendations to UNODC:

Follow up to the project
CONIG should seek to continue providing input and technical advice to ACAs in Nigeria, prioritising areas where UNODC has unique expertise and skills, or where long-term UNODC input is appropriate. These areas include in particular the UNCAC review process; research and statistics; legislation and regulation; and the provision of intelligence software, coupled with training on its use and maintenance.

CONIG should also continue to support CSOs' work against corruption, through training and advice, and through encouragement of networking between CSOs and ACAs.

CONIG should collaborate with MBNP to develop an exit strategy for the project, ensuring that ACAs and CSOs continue to build on the benefits of the project in terms of capacity and training.

Need to enhance linkages between ACA and CSO support
CONIG should ensure that future projects in Nigeria should integrate work with CSOs and with ACAs. UNODC's expertise is relevant to both sets of stakeholders, and UNODC should in future encourage ACA and CSO collaboration in areas such as prevention, whistleblower protection, budget monitoring and public awareness raising.

CONIG should also consider the development of a communication and public advocacy strategy in the context of support to the implementation of the NACS.

CONIG should seek MBNP support to report on project progress to senior political leadership, encouraging involvement of political leaders in selected project activities.

Prioritisation of Training of Trainers
Future projects should emphasize a Training of Trainers approach. It is important for UNODC teams and managers involved in the design of future projects to reflect on the best ways to achieve critical mass for the acquisition of new skills. They should consider the option of using a ToT approach more systematically, or to work directly with judicial training institutions, with a view to entrenching the acquisition of new skills by ACA staff. The Corruption and Economic Crime Branch of UNODC Headquarters should also be consulted at the project design stage.

Response to donor requirements in project design
The UNODC senior management – including but not limited to CONIG and RSAME – should ensure that future UNODC projects intended for EU funding are fully in line with EU project cycle management requirements, including in relation to budget presentation and staffing levels. They should include detailed work plans, agreed with the relevant ACAs. Staff seniority and numbers should be consistent with the anticipated scope of activities and budget, and the eligibility of expenses such as IT services should be firmly agreed at the outset. UNODC should also ensure that future project designs include a thorough political and social risk analysis, as well as risk

mitigation strategies. At UNODC Headquarters, the Division for Management and the Co-financing and Partnerships Section (including the UNODC Liaison Office in Brussels) should also be consulted on this aspect.

Senior management support for future projects
Project teams and managers of future projects should have access to timely and appropriate senior management support. In particular, the respective responsibilities of the UNODC in-country Representative and those of Headquarters-based managers should be streamlined, with a view to ensuring that the project manager enjoys adequate levels of decision-making authority, while being subject to effective and timely accountability. CONIG and RSAME should initiate discussions to improve cooperation and coordination in that respect. The Division for Management (including the Financial Resources Management Service [FRMS], the Human Resources Management Service [HRMS] and the Procurement Unit) should also be consulted in this respect.

Headquarters vetting of future project proposals
UNODC senior management should reinforce the vetting of project proposals. Project proposals involving budgets of a size comparable to the present project should be carefully vetted by UNODC Headquarters, in a process bringing together representatives of all divisions, and ensuring that all relevant divisions and units are aware of their share of responsibility to ensure successful project implementation. Project monitoring mechanisms should report directly to senior management, in case of necessity. Project proposals should include a thorough risk analysis, including political and logistical risks. CONIG and RSAME should consider whether the current Programme Review Committee is appropriate in this respect, and whether it should be modified to improve project vetting in the region. Within the Division for Management, FRMS and HRMS should also be consulted in this regard.

Strengthening staffing of future project teams
UNODC teams and managers involved in the design of future projects should ensure that project teams include appropriate staff. Project teams should bring together staff with substantial experience with policy and administrative expertise, in sufficient numbers to cover the various areas of expertise needed and to address the necessary pace of activities. This should include the recruitment of project managers with the required level of experience of management of large projects and sufficient internal UNODC experience. Though this issue is of broader concern, CONIG and RSAME should address this issue with regard to future projects in Nigeria.

V.   LESSONS LEARNED

The lessons learned described in this chapter stems from statements of stakeholders interviewed and from the evaluators' experience of conducting this evaluation.

Relationship between UNODC, MNBP and the EU: need for more informal debates
The relationship between the project team and the EU Delegation in Abuja was generally good in the sense that communications were kept open and that UNODC delivered financial and narrative progress reports to the standard required by the EU (with perhaps some exceptions in the first year or so, at a time when the project team was under much pressure). Nevertheless, it was striking that the relationship was dominated to a substantial extent by matters of procedure, administration and accounting. While there is every reason for accountability to be appropriately enforced by the EUD as a donor, it became clear in the course of the evaluation that there were not enough opportunities for the EUD and UNODC to discuss in informal settings the strategy underpinning the project, and for the two sides to learn and develop a constructive joint understanding of the challenges of implementation.

Similarly, the relationship between CONIG, the EU and MNBP was effective in terms of procedure, but lacked depth in terms of strategy. Senior project team members met representatives of MNBP and the EUD on an annual basis, but these meetings were too infrequent to allow for timely information about project progress, and for quick remedial action when delays occurred. In addition, the formal nature of the meetings and their focus on procedure did not offer opportunities for discussions of a strategic or policy nature. It would be advisable in future, in addition to such formal meetings of representatives of the three institutions, to hold more informal preparatory discussions where the experience of project implementation can be discussed, and relevant lessons brought to the attention of senior MNBP leaders.

Work with CSOs
Across 17 states in Nigeria in 2014, CSOs were assessed by UNDP team prior to the selection of the 10 CSOs grantees. In the course of the assessment, most of the CSOs assessed were found to still struggle to build constituencies, often due to lack of resources. Financial viability was observed as one of the weakest dimensions of CSOs' sustainability. Advocacy appears to be one of the strongest dimensions. Within the context of X60 project it was suggested by the UNDP team that an anti-corruption CSO support group/professional association is needed to continually diffuse best practices to new CSOs entering the anti-corruption space and to enhance internal network, alliance, coalitions, partnerships, and cooperation across programs, thematic focus areas, research, and advocacy initiatives. There is a general consensus among most project beneficiaries that more still need to be done to reach out to and connect with citizens at the local level, in a manner that links the fight against corruption on the every-day concerns of Nigerians.

The X60 project beneficiaries across the three outcomes particularly among the anti-corruption agencies and the sub-nation civil society organisations were not connected and as such their various activities were not easily understandable to all. There was no conscious approach developed to communicate and connect all beneficiaries of the project to larger groups of the Nigerian population in order to improve the fight against corruption. One of

the fall outs here include, ineffectiveness of the project to strengthen the synergy among all beneficiary of the project's outcomes 1, 2 and 3, towards establishing a common understanding of and ability to cover anticorruption strategy that would enable them to report more effectively on issues of public project finance analysis, transparency and accountability and expenditure of public funds.

The project built on the experiences, mandates and works of its beneficiaries, but did not really create linkages with existing thematic anti-corruption areas of the beneficiaries, and as such it was difficult to identify cross-cutting issues or separate initiatives that apply across the entire programming. The point here is that there was less emphasis on creating a platform where all project beneficiaries would learn from each other on what they are doing in the fight against corruption within the context of the project.

ANNEX I. TERMS OF REFERENCE OF THE EVALUATION

I. BACKGROUND AND CONTEXT

Project number:	NGAX60
Project title:	Support to Anti-Corruption in Nigeria
Duration:	57 Months (November 2012 – August 2017)
Location:	Nigeria
Linkages to Country Programme:	N/A
Linkages to Regional Programme:	Regional Programme for West Africa 2010-2014 and 2016-2020
Linkages to Thematic Programme:	Thematic Programme on Corruption, Economic Fraud & Identity-Related Crime (2012-2015)
Executing Agency:	United Nations Office on Drugs and Crime (UNODC)
Partner Organizations:	Anti-Corruption Agencies (Bureau of Public Procurement, Code of Conduct Bureau, Code of Conduct Tribunal, Economic and Financial Crimes Commission, Nigeria Financial Intelligence Unit, Independent Corrupt Practices and other Related Offences Commission, Public Complaints Commission, Special Control Unit against Money Laundering, Technical Unit on Governance and Anti-Corruption Reforms/Inter Agency Task Team, as well as the Nigerian Extractive Industries Transparency Initiative), Nigeria Police Force and the Nigeria Judiciary (FCT

	high Court and Federal high Court); Other key Stakeholders include relevant Ministries (Federal Ministry of Justice), Departments and Agencies, and Non-State Actors
Total Approved Budget:	US$ 18,533,863
Donor:	European Union (EU)

Project Manager/Coordinator:	Mr. Polleak Ok Serei, Project Coordinator
Type of evaluation (mid-term or final):	Final Evaluation
Time period covered by the evaluation:	November 2012 – July 2017
Geographical coverage of the evaluation:	Nigeria (National/Federal)
Planned budget for this evaluation:	US$ 108,932
Core Learning Partners[26] (entities):	United Nations Development Programme (UNDP); Ministry of Budget and National Planning (MBNP); European Union (EU)

---

26 The Core Learning Partners (CLP) are the key stakeholders of the subject evaluated (project, programme, policy etc. who have an interest in the evaluation). The CLP works closely with the Evaluation Manager to guide the evaluation process.

I.   BACKGROUND AND CONTEXT

A. Project Overview and Historical Context

Corruption has, over time, marred Nigeria's economic growth and both the previous and the current Governments have recognized corruption as a key obstacle to development and economic growth. Thus, strengthening integrity and reducing corruption have been emphasized on the list of national priorities. The National Development Plan for Nigeria - Vision 20:2020 - states, for instance, that "Corruption has been identified as a key element inhibiting economic growth and social advancement in Nigeria, through its negative impact on the inflow of investments into the economy, the high cost of doing business and the erosion of public confidence in the system. Fighting corruption is therefore a pre-requisite for achieving our National Vision".[27] Nigeria has initiated and deployed a range of policies that mainly focussed on the creation of anti-corruption institutions As a result, Nigeria has a number of institutions involved and concerned with anti-corruption efforts. This poses a risk of duplication of efforts in various forms. Some of the institutions have a clear anti-corruption mandate, and their core existence is wholly dedicated to Nigeria's anti-corruption effort; other institutions have only limited carriage of an anti-corruption nature. One of the key challenges therefore is to avoid fragmentation and to better coordinate efforts in this area.

The "Support to Anti-Corruption in Nigeria" Project (NGAX60) is being implemented by the United Nations Office on Drugs and Crime (UNODC) since November 2012 and until August 2017. It is funded by the European Union under the 10th European Development Fund (EDF). Project activities are being implemented by a Project Team which is based at the UNODC Country Office in Nigeria (Abuja), in partnership with 14 Anti-Corruption Agencies and with UNDP as a co-implementing partner. Technical assistance is being delivered by the project through the direct conduct of expert services on anti-corruption legislation and policy-making, support to the creation of inter-agency coordination structures and facilitation of meetings, and capacity-building through training and mentoring activities. Aside from this anti-corruption project, there are two other projects on drugs and justice sector reform in Nigeria that are being funded under the 10th EDF and are also being implemented by UNODC. Altogether, the 3 EU-funded projects are being supported by a Programme Support Team (PST) based in Abuja.

The anti-corruption project builds on the achievements of the 2005-2011 project entitled "Support to the Economic and Financial Crimes Commission and the Nigerian Judiciary" (NGAS08), and supports activities of the Government of Nigeria and of Nigerian Civil Society Organizations (CSOs) by promoting good governance and by contributing to their efforts in enhancing transparency, accountability and combating corruption. The projects aims to: i) strengthen anti-corruption policy-making, coordination, research, monitoring and legislation, in line with the United Nations Convention against Corruption (UNCAC); ii) enhance institutional and operational capacity of anti-corruption agencies and improving inter-agency cooperation; and iii) empower CSOs involved in anti-corruption.

A gender-sensitive and human rights-based approach was taken into consideration in implementing the project, in line with established UNODC criteria and relevant ECOSOC resolutions. In this regard, it is to note that while collecting and analysing data within the framework of this project, this data will be disaggregated by gender, as much as possible, to assess progress towards achieving gender equality and the empowerment of women. When undertaking training activities, the project,

---

[27] http://www.npc.gov.ng/vault/vision%202020%20document/Nigeria_Vision_2020.docx

encourages the fair participation of women vis-à-vis the target groups. In addition, the grants scheme under the third component of the project encourages specific gender-oriented activities (grants to NGOs focusing on the role of women in anti-corruption prevention for instance). The project also aims at maximizing the positive human rights impact of its work, and always takes the human rights perspective into account while planning its activities. In planning and implementing activities within this project, the project aims at ensuring the participation of all relevant stakeholders, including hard-to-reach and disenfranchised groups. Furthermore, the project aims at ensuring that its partners, including national counterparts and civil society organizations, respect human rights principles, especially when acting in the framework of the project.

B. Justification of the Project and Main Experiences/Challenges

Strengthening integrity and reducing corruption has been a priority for Nigeria for a number of years. While the anti-corruption sector in Nigeria currently has a reasonable quantity and quality of legislative texts, statutes and mandates[28] to carry out its work and a number of anti-corruption institutions have been created, there is a risk of a fragmented and poorly coordinated anti-corruption sector in the country and a need to strengthen the capacities of law enforcement and prevention agencies. This project builds on the achievements of a previous EU-funded project under the 9th EDF, and supports the Government of Nigeria by promoting good governance and by contributing to Nigeria's efforts in enhancing transparency, accountability and combating corruption. Throughout the project implementation period, key anti-corruption instruments have been adopted and inter-agency coordination mechanisms were established through project support. Capacities of the anti-corruption agencies have also been upgraded, and CSOs have been brought into the overall effort. However, a National Anti-Corruption Strategy (NACS) had not yet been issued until December 2016 – and its effective implementation still remains to be confirmed –, while the original project design was built around this premise. There were also internal, administrative, challenges faced by the project, primarily a slow start-up due to delayed staffing, staff turnover, delay of procurement delegation of authority, and then UNODC's transition to a new UN system wide financial administration system, Umoja.

C. Project Documents and Revisions

Project document	Year	Please provide general information regarding the original project document.
Original Project Document	2012	*The project document is part of the Contribution Agreement between the EU and UNODC (Description of the Action)*

---

[28] Nigeria has adopted various international conventions, such as the *United Nations Conventions on Transnational Organized Crime, 2000,* the recommendations of the *Financial Action Task Force (FATF)* and the *UN Convention against Corruption, 2003*, which was ratified by Nigeria in 2004. In addition to this international framework, Nigeria also has an adequate national legal framework which provides a fair basis for its efforts in combating corruption. The passing of the *2011 Freedom of Information Act* further complements the legislative framework for anti-corruption activities. Other national legislation worth mentioning include the *2004 Money Laundering Prohibition Act* (as amended in 2010), the *Anti-money Laundering/Combating of Financing of Terrorism (AML/CFT) Regulation* published in 2009 and the *2011 Money Laundering (Prohibition) Act*.

Project revision (please add further rows as needed)	Year	Reason & purpose	Change in (please check)
1 Project Revision	2016	Due to the mid-term evaluation recommendations, the project underwent some changes	✓ Budget ✓ Timeframe ✓ Logframe

The original version of the project document was produced in November 2012. This was part of the Contribution Agreement between the European Union (EU) and UNODC that was signed within that period. A final signed version of the project document was completed in December 2012.

In 2015, a mid-term evaluation of the 3 EU-funded projects (including this anti-corruption project) was commissioned by the EU. The mid-term evaluation report brought about a set of recommendations, and a management response prepared by UNODC addressed the key issues that were agreed upon by the EU and UNODC. These actions are being regularly discussed in trilateral meetings that are being held between the EU, the Ministry of Budget and National Planning (MBNP) and UNODC since the finalization of the management response in December 2016.

After the completion of the mid-term evaluation in 2015, the project document for the anti-corruption project was revised in accordance with the recommendations stated in the mid-term evaluation report and the agreements reached between the EU and UNODC.[29] A revised version of the project document was finalized in 2016, as part of the riders to the Contribution Agreement. The differentiating features of the revised project document are as follows:

- A six-month extension of the project from February 2017 to August 2017;
- A revised logframe, reflecting more result-oriented outcomes and outputs; a review of the nature of the objectives in relation to the National Anti-Corruption Strategy (NACS), as the adoption of this key policy document has proven to be a very complex and long process, which had not been fully factored into the initial version of the project; more realistic and targeted objectives, building on past achievements and taking into account a better-informed appreciation of the project's capacity to deliver and the environment in which it operates;
- A reduced budget reflecting the review of the objectives as per the previous bullet point;
- An adjusted staffing structure clarifying the contribution of the substantive experts necessary to reach the revised project's objectives;
- The integration of the visibility strategy in the project; and
- An update in the reporting deadlines, in line with other EU-funded projects implemented by UNODC.

D. Main Objective and Outcomes

The objective of the "Support to Anti-Corruption in Nigeria" Project (NGAX60) is to support the Nigerian Government in its efforts in preventing and fighting corruption. This will be achieved through the attainment of 3 Outcomes:

---

[29] Evaluation Report – Mid-Term Evaluation of EU Support to Anti-Corruption in Nigeria (FED/2011/022-161). Prepared by Particip GmbH and GOPA Consultants. July – August 2015.

Outcome 1 - Strengthened anti-corruption policy-making, coordination, research, monitoring and legislation, in line with the United Nations Convention Against Corruption (UNCAC);

Outcome 2 - Institutional and operational capacity of anti-corruption agencies enhanced and inter-agency cooperation improved; and

Outcome 3 - Civil Society Organizations empowered to increase the provision of services and their participation in AC activities.

Indicators on the project objective, outcomes and outputs are specified in the logical framework matrix. The baseline data for these indicators are also included in the log frame, while current data are stated in the project progress reports.

E. Contribution to UNODC's Regional and Thematic Programme

The project is contributing to the UNODC Regional Programme for West Africa 2016-2020 (aside from contributing to the previous 2010-2014 Regional Programme) and to the UNODC Thematic Programme on Corruption, Economic Fraud & Identity-Related Crime (2012-2015).

F. UNODC Strategy Context and to the Sustainable Development Goals

The project is in line with the strategic priorities agreed upon between the EU and the Government of Nigeria under the 10th European Development Fund (EDF) as developed under the Country Strategy Paper and National Indicative Programme.

For UNODC, the implementation of the project is aligned with the expected accomplishments of the sub-programmes outlined in the UNODC Strategic Framework 2012–2013, in particular sub-programme 2 (Countering Corruption), sub-programme 6 (Research and Trend Analysis) and sub-programme 7 (Policy Support), as well as to all three result areas of the UNODC Medium Term Strategy 2008-2011 (Rule of Law; Policy and Trend Analysis; Prevention, Treatment and Reintegration), by striking a sound balance between the three components of evidence-based policy, institution-building, and social mobilization. The project is also consistent with the subsequent UNODC strategic frameworks for 2014-2015 and 2016-2017 that also carried forward specific sub-programmes on countering corruption. Finally, the project also serves to implement the UNODC's Regional Programme for West Africa (2010-2014 and 2016-2020), which is used as a framework for all programmes and projects developed at the national level, and UNODC's thematic programme on Corruption, Economic Fraud and Identity-Related Crime for 2012-2015.

The project's overall objective is to support Nigeria's efforts in preventing and fighting corruption, in support of national priorities and strategies defined in the Vision 20:2020. With Nigeria being an important member of the Economic Community of West African States (ECOWAS), the project falls well under the objective of the ECOWAS Protocol on the Fight against Corruption of the Economic Community of West African States, which was adopted with the objective of strengthening effective mechanisms to prevent, suppress and eradicate corruption in each of the States parties. The project is strategically appropriate to the United Nations Development Assistance Framework (UNDAF) for Nigeria.

The project is aligned with the achievement of the Sustainable Development Goals (SDGs), particularly SDG 16: Promote Peaceful and Inclusive Communities and specifically Target 16.5: Substantially Reduce Corruption and Bribery in All Its Forms.

II.   DISBURSEMENT HISTORY

Time period covered by the project: November 2012 to August 2017
Time period covered by the evaluation: November 2012 to beginning of evaluation

Total overall budget (fully pledged):   US$ 18,533,863
Total disbursed budget as of March 2017:   US$14,146,808
Total expenditures (disbursements + obligations) as of 13 March 2017:[30]US$ 12,274,167
Total expenditures in % against disbursed budget: 87%

III.   PURPOSE OF THE EVALUATION

A. Reasons Behind the Evaluation

The conduct of a final evaluation for the "Support to Anti-Corruption in Nigeria" Project (NGAX60) is in line with UNODC Evaluation Policy, and in fulfilment of the commitments set in the project document which was agreed upon by UNODC, EU and the Government of Nigeria. The final evaluation will be summative in nature, assessing the relevance, efficiency, effectiveness, partnerships and cooperation, gender and human rights, as well as sustainability and impact of the project implementation. It will further derive lessons learned, best practice and recommendations to inform future decision-making and organizational learning. In addition, it will assess the implementation of the recommendations of the EU mid-term evaluation in 2015: the three outcomes, although rephrased, remain unchanged; indicators were revised for more realistic targets and more robust result-based reporting; activities were reduced and restructured. In particular, the success of the project is no longer dependent on the adoption of the NACS or lack thereof; under outcome 2, the project adopted a heavy focus on mentoring, by topic, which is also aimed at benefiting working groups substantially, under outcome 1; the new version also better highlights emphasis on prevention, as recommended by evaluators. Other changes include: a revised staffing structure clarifying the contribution of the substantive experts that is necessary to reach the revised project's objectives; the integration of the visibility strategy in the project; the revision of reporting deadlines, in line with other EU-funded projects implemented by UNODC.

B. Assumed Accomplishments of the Evaluation

----

[30] Source:

Total Disbursement from inception to 31 December 2015 (FRMS certified 2015 financial report)	$7,372.671.00
Total Disbursement from 2016 to 2017 (Umoja report as at 13/03/2017)	$2,741,251.74
UNDP Total Disbursement for 2016 (Not reported in Umoja)	$525,317.49
Total Disbursement to date	**$10,639,240.23**
2017 Obligations (Umoja report as at 13/03/2017)	$938,251.74
UNDP Obligations (Balance of unspent disbursement)	$696,675.00
Total Disbursement + Obligations	**$12,274,166.97**

Through the final evaluation process, the Core Learning Partners are expected to be informed about the achievements/non-achievements of the project, as well as be objectively informed on the gaps and challenges faced in project implementation and support. The results of the final evaluation are envisioned to guide UNODC in designing future interventions on anti-corruption, taking into account the recommendations as well as the lessons derived from previous project implementation. As Core Learning Partners, the project partners are expected to provide critical inputs to the evaluation process.

C. Main Evaluation Users

The Anti-Corruption Agencies that act as the project partners and the Government of Nigeria will be the main users of the final evaluation report, in terms of guiding their next steps on future programming for anti-corruption initiatives. The EU will also benefit from the final evaluation exercise, specifically through the information that will be generated by the process and its possible effects on current reporting demands and donor programming. UNODC, as well as UNDP, will also be a key user of the evaluation outputs, primarily through the evaluation's impact on reporting of results and planning for future anti-corruption programmes. The aspects of transparency, independent assessment, and accountability will also be addressed through the evaluation.

IV.   SCOPE OF THE EVALUATION

A. Unit of Analysis

The unit of analysis to be covered by the final evaluation is the UNODC-implemented project entitled "Support to Anti-Corruption in Nigeria" (NGAX60). It encompasses the 3 outcomes expected from the project activities, and the outputs associated with these outcomes, as well as the activities and inputs that were planned and/or delivered per the logical framework matrix and the project work plans. However, possible synergies between this anti-corruption project with the other EU-funded projects (e.g. the justice sector reform project) will also be explored through the evaluation process.

The task is an independent project evaluation in accordance with the UNODC Evaluation Policy and norms and standards. As such, while the evaluation may explore synergies or complementarities with the two other EU-funded projects[31] being implemented by UNODC in Nigeria, project management in consultation with IEU decided that a cluster evaluation across the projects will not be possible due to differences in the pace of implementation of the two projects as well as in their governance and management structures. The key partners (UNODC, the Government of Nigeria and the European Union) have also agreed that the evaluations will be independently done for the two projects.

B. Time Period to be Covered

_____

[31] The two other projects are "Response to Drugs and Related Organized Crime in Nigeria" (NGAV16) and "Support to the Justice Sector in Nigeria" (NGAV18).

The final evaluation will cover all work plans, activities, achievements, and lessons under the "Support to Anti-Corruption in Nigeria" Project (NGAX60) from November 2012 (project start) until the final evaluation starts.

C. Geographical Coverage

The project to be evaluated is being implemented at the national/federal level in Nigeria. The main target groups are national anti-corruption agencies that are based in Abuja, Nigeria. While the project is also working with some CSOs that are based at selected states, the final evaluation will mainly look into the effects of the project interventions at the national (federal) level, where the anti-corruption agencies operate. The evaluation will be conducted based on the following Development Assistance Committee (DAC) criteria: relevance, efficiency, effectiveness, impact and sustainability as well as partnerships and cooperation, gender and human rights and lessons learned. The questions will be further refined by the Evaluation Team.

V.   EVALUATION CRITERIA AND KEY EVALUATION QUESTIONS

The evaluation will be conducted based on the following Development Assistance Committee (DAC) criteria: relevance, efficiency, effectiveness, impact and sustainability as well as partnerships and cooperation, gender and human rights and lessons learned. The questions will be further refined by the Evaluation Team.

Relevance
1. To what extent was the project aligned with the needs, plans and priorities of the Government of Nigeria (e.g. the UNCAC) as a whole?
2. To what extent did the project match the needs of the anti-corruption agencies and the CSOs that are part of the anti-corruption effort in Nigeria?
3. To what extent did the project correspond to the development objectives stated in the 10th EDF?
4. To what extent did the project contribute to the UNDAF in Nigeria, the regional programmes of UNODC in West Africa, as well as the thematic programme on corruption, economic fraud and identity-related crime?
Effectiveness
1. To what extent are the project objective and outcomes being achieved?
2. To what extent are the project outputs and activities being delivered, and to what extent are the project outputs and activities useful to beneficiaries and end-users?
3. How effective are the implementation and visibility strategies as envisioned in the project document and as implemented by the project?
4. What factors are affecting the overall effectiveness of the project?
Efficiency

1. To what extent were the activities implemented and outputs delivered as planned?
2. To what extent were available knowledge, material, technological and financial inputs utilized to achieve the project purposes?
3. To what extent did the governance and management mechanisms function to make relevant and timely decisions related to the achievement of the project objective?
4. What factors affected the overall efficiency of the project?
Impact
1. What are the immediate effects, if any, of the project outputs (i.e. policies and coordination mechanisms) on the anti-corruption efforts in Nigeria?
2. To what extent have the capacity-building activities created an "impact" on the beneficiaries (i.e. institutions and persons)?
3. To what extent has the project created a pioneering or innovative approach towards anti-corruption in Nigeria that can be regarded as a model for replication in future interventions?
4. What factors are affecting the "impact" of the project or its potential?
Sustainability
1. What sustainability strategies were envisioned for the project and to what extent were these adopted?
2. To what extent are the project activities and outputs expected to continue and be utilized beyond the life of the project?
3. What factors are affecting the sustainability of the intervention?
Partnerships and Cooperation
1. To what extent were the partnership and cooperation agreements established through the project relevant for the achievement of the project objective?
2. To what extent were the partnership agreements created by the project aligned with the sustainability strategy of the intervention?
3. What factors affected the effectiveness, efficiency and sustainability of the partnership and cooperation initiatives of the project?
Human Rights and Gender Equality/Women's Empowerment
1. To what extent was the theme of human rights analysed and considered in the project design?
2. To what extent was the aspect of human rights addressed through the project activities?
3. To what extent was the aspect of women's empowerment/gender equality considered in the project design?
4. To what extent was the aspect of women's empowerment/gender equality addressed through the project activities?
5. What factors affected the effectiveness of the project in mainstreaming and addressing the issues of human rights and women's empowerment/gender equality?
Lessons Learned and Best Practices

1. What best practices on anti-corruption legislation, capacity-building, and inter-agency coordination can be drawn from the project experience?
2. Are there key lessons on the capacity-building approaches (i.e. training, mentoring, input provision) followed by the project that should be considered for future programming?
3. Are there key lessons on the mainstreaming of CSOs in the anti-corruption efforts in Nigeria?
4. What key lessons on partnerships in the context of an anti-corruption programme in Nigeria should be considered in a future project design?
5. What key lessons on the mainstreaming of human rights in the context of an anti-corruption programme in Nigeria should be considered in a future project design?
6. What key lessons on the mainstreaming of women's empowerment/gender equality in the context of an anti-corruption programme in Nigeria should be considered in a future project design?

VI.   EVALUATION METHODOLOGY

A. Collection and Analysis of Data/Information

1.   As Part of the Inception Report

Specific details on the methods to be applied by the Evaluation Team for the collection and analysis of data/information for the final evaluation will be included in an *Inception Report*. A draft of the Inception Report will be submitted for review and corrections/comments to the IEU, and a revised version of the said report will be prepared by the Evaluation Team based on corrections/comments.

2.   Steps in Data/Information Collection

The collection of data/information for the final evaluation is however expected to proceed in the following stages:

Identification of Data/Information Requirements – Based on the evaluation questions that are stated on Part III of this TOR, the data/information required to address these questions are identified by the Evaluation Team;

Review of Secondary Data/Information – Available data/information from the sources mentioned in the succeeding section will be used by the Evaluation Team. This task will be part of a home-based documents review to be done by the evaluators. Relevant data/information, especially those from existing project progress reports and monitoring reports, should be cited and used as bases in exploring the evaluation questions. Preliminary findings on basis of the desk review will be outlined in the Inception Report;

Primary Research of Data/Information Gaps – Required data/information that are not available from existing documents will be the subject of primary research to be done by the Evaluation Team. Primary research will also be done to triangulate existing data. Primary research work will mainly consist of key informant interviews with beneficiaries, partners, project staff and consultants, and officials from UNODC, UNDP, EU and the Ministry of Budget and National Planning. Survey/s may also be conducted by the Evaluation Team, especially to ascertain the immediate effects and

sustainability of the various training courses across the anti-corruption agencies. Primary research work for the final evaluation will be carried out through a field mission to Abuja, Nigeria where the project office and partners are located.

3. Methods for Collection and Analysis of Data/Information

To the best possible extent, the collection and analysis of data/information to be used for the final evaluation are expected to be done through *triangulation* of sources and methods. This will involve the collection and validation of data/information from multiple sources (e.g. separate interviews with beneficiaries, project staff and consultants, focal points, and other key informants such as members of the Presidential Advisory Committee Against Corruption) and the use of various collection methods (e.g. documents review, interviews, survey/s, and validation meetings).

A *Mixed-Methods Approach* is also prescribed for this evaluation. This features exploring both quantitative and qualitative data/information that should provide a fuller understanding on the project's achievements, effects, and challenges. A qualitative approach is especially desired to ascertain the possible "impact" of the project in terms of anti-corruption perceptions, capacities, behaviours and approaches among the target groups. Furthermore, the evaluation will implement and follow an inclusive and gender-sensitive methodology.

4. Validation of Data/Information

Data/Information to be used in preparing the inception and evaluation reports shall be subject to a validation process through the various informant interviews (as part of the triangulation technique), and the formal reviews of these data/information by the Core Learning Partners.

5. Special Considerations

In 2015, the UNODC Country Office in Nigeria (CONIG) piloted a Results-Oriented Monitoring and Evaluation (ROME) System which is being applied for the project. The system has enabled a monitoring of the project results through the conduct of pre/post-tests, questionnaires, and a survey. The final independent evaluation is a part of the ROME System, and as such, the monitoring work and data should be considered and analysed as far as possible, without jeopardising the independence of the data collection and analysis.

The United Nations Development Programme (UNDP) is an implementing partner of UNODC for the CSO component of the project (i.e. Outcome 3). UNDP also has its own system in monitoring the CSO partners under this component. The final evaluation shall also incorporate the monitoring data and reports on these from UNDP.

Throughout the implementation period, the project has worked with changing Focal Points from each of the 14 anti-corruption agencies who may have limited data/information to share for the final evaluation (for example, they may have knowledge on the project only for a certain time period). There is also a challenge in their internal liaison with their respective superiors who represent their agencies at the Project Management Committee (PMC) Meetings. The Focal Points and PMC Members who will be interviewed for the evaluation will have to be determined, in order to ensure that these informants will have the proper and adequate data/information to share with the Evaluation Team.

B. Sources of Data/Information

Secondary data/information to be obtained by the Evaluation Team for the final evaluation shall be sourced from the various project documents, work plans, progress reports, monitoring tools and reports, publications, and other documents that are listed in Annex II of this TOR.

Primary data/information that will be generated by the Evaluation Team are expected to come from the key informant interviews, survey/s, and presentation meetings that will be conducted as part of the evaluation process. The set of informants shall include the following:

- End-users of the project outputs (e.g. anti-corruption policies, guidelines and publications)
- Beneficiaries of the training courses, mentoring programmes, and sponsorship activities
- Members of the inter-agency coordination mechanisms
- Anti-corruption experts (e.g. UNODC HQ Experts and Members of the Presidential Advisory Committee Against Corruption)
- Officials from the Anti-Corruption Agencies, including Focal Points and Members of the Project Management Committee
- Leaders from the participating CSOs, in particular grantees and members of the CSO Advisory Committee
- Senior Officials from UNODC (CONIG), UNDP, EU and MBNP
- Officials from Partner-Institutions (e.g. Administrative Staff College of Nigeria, Nigerian Institute for Advanced Legal Studies, Anti-Corruption Academy of Nigeria, EFCC Academy, National Bureau of Statistics, the National Assembly, the Federal Radio Corporation of Nigeria)
- Project staff and consultants, at CONIG, ROSEN and HQ (CEB, RSAME)
- Counterpart UNDP staff

VII.   TIMEFRAME AND DELIVERABLES

Time Frame for the Evaluation

The final evaluation of the "Support to Anti-Corruption in Nigeria" Project (NGAX60) will be conducted over a period of 5 months, from April until early August 2017. This time frame includes a home-based inception phase (3 weeks), a field mission to Nigeria for the conduct of primary research and presentations (2 weeks), and a home-based report-writing phase (4 weeks).

Time Frame for the Field Mission

A field mission to Nigeria by the Evaluation Team is expected to take place from 2 to 16 May 2017. Aside from collecting data/information needed to address the evaluation questions, the evaluators are also requested to make an informal presentation of the inception report and key findings from the evaluation mission to the Core Learning Partners.

Expected Deliverables and Time Frame

The Evaluation Team is expected to deliver the following (in line with UNODC evaluation guidelines, templates, etc.):

- **Draft and Final Inception Report** – An inception report that describes the evaluation team's initial understanding about the project based on the documents review, specific evaluation questions to be addressed, approach and methodology to be applied including the tools to be used, schedule of activities and delivery of reports, and foreseen limitations of the study will be prepared and cleared prior to the conduct of the field mission. A draft of the report will be submitted, and an informal presentation shall be made to the Core Learning Partners at the onset of the field mission to Nigeria. Factual corrections and comments by the Core Learning Partners and the IEU on the draft should be addressed by the Evaluation Team in preparing a final version.

- **Draft Evaluation Report** – A draft evaluation report that mainly addresses the evaluation questions and is based on UNODC evaluation guidelines, handbook, norms and standards shall be prepared and submitted by the Evaluation Team. The report should be structured per the outline shown in Annex IV of this TOR. IEU thoroughly reviews the report for quality assurance and communicates necessary changes and revisions to the evaluation team. Project management has the opportunity to comment on factual errors before the final draft cleared by IEU is shared with the CLPs for their review.

- **Final Evaluation Report** – In order to produce the final report, the evaluation team will consider all received comments and revise the report accordingly under the premise of continued independence, rigor of methodology and robustness of findings. These shall be consolidated per the format shown on Annex V, and sent to the Evaluation Team to be used as bases in revising the report. The Evaluation Team will be asked to come back to Nigeria to present the draft report to the Project Management Committee that is envisioned to hold its meeting in July 2017.

Duties	*Time Frame*	*Location*	*Key Tasks*
	3 – 14 April 2017	Home-Based	List of evaluation questions;

Desk review and preparation of Draft Inception Report	(10 work-days)		Evaluation tools; Draft Inception report (to be reviewed and cleared by IEU; can entail various rounds of comments)
Review of draft Inception Report by IEU (can entail various rounds of comments)	14 – 21 April 2017 (1 week)		
Incorporation of comments from IEU (can entail various rounds of comments)	21 – 25 April 2017 (3 working days)	Home-Based	
Deliverable A – Final Inception Report (20-25 pages) in line with UNODC Evaluation Guidelines, Handbook, Templates, Norms and Standards	**Final Inception Report – By 25 April 2017 (13 overall working days)**	**Home-based**	**To be cleared by IEU and accepted by UNODC CONIG**
Field Mission: Briefings, Interviews, Survey/s, Presentation of preliminary findings	02 May 2017 – 16 May 2017 (14 work-days)	Abuja, Nigeria	Informal Presentation of Inception Report; Informal Presentation of Key Findings
Drafting of the Evaluation Report; Submission to Project Management and IEU for review	18 May 2017 – 7 June 2017 (15 work days)	Home-Based	Draft evaluation report (to be reviewed and cleared by IEU; can entail various rounds of comments)
Review of IEU for quality assurance and Project Management for factual errors	12-21 June 2017		
Incorporation of corrections and comments from Evaluation Committee and IEU	21 – 23 June 2017 (3 working days)	Home-based	
Deliverable B – Draft Evaluation Report in line with UNODC Evaluation Guidelines, Handbook, Templates, Norms and Standards	**23 June 2017 (32 overall working days)**	**Abuja, Nigeria and Home-Based**	**To be cleared by IEU and accepted by UNODC CONIG**
Draft Evaluation Report to be shared with CLPs for comments	26 - 30 June 2017		Comments and corrections of CLPs on the draft report
Consideration of comments from Core Learning Partners	3 – 5 July 2017 (3 work-days)	Home-based	
Final review by IEU, incorporation of comments and finalisation of report	6 – 10 July 2017 (3 work-days)	Home-based	Revised draft evaluation report
Presentation of the Evaluation Report to the Project Management Committee	Day TBD (1 work-day)	TBD	Power point presentation delivered
Deliverable C: Final Evaluation Report	**10 July 2017 (7 working days)**	**Home-based and Abuja, Nigeria**	**Final evaluation report, Presentation; all to be cleared by IEU and accepted by UNODC CONIG**

Project Management: Finalise Evaluation Follow-up Plan in ProFi	21 July 2017		Final Evaluation Follow-up Plan to be cleared by IEU
Project Management: Disseminate final evaluation report	28 July 2017		Final evaluation report disseminated

VIII. EVALUATION TEAM COMPOSITION

Number of Evaluators Needed

The final evaluation of the "Support to Anti-Corruption in Nigeria" Project (NGAX60) will be carried out by a team of 3 experts. The Team Leader will be an International Evaluation Expert with at least 10 years of experience in conducting high-quality evaluations, preferably final or terminal evaluations and outcome evaluations. Two National/International Anti-Corruption Expert will serve as the other members of the team. These experts should have at least 8-9 years of experience or knowledge on anti-corruption initiatives, preferably in Nigeria and in the areas of research, legislation or capacity-building. At least one of the team members should be female. In addition, the evaluation team should have knowledge of/ expertise in a gender-sensitive and human rights-based evaluation approach and gender mainstreaming in evaluation.

Role of the Team Leader/International Evaluation Expert

While all evaluation functions will be done as a team, the Team Leader/International Evaluation Expert is expected to be mainly responsible for the following tasks: carry out the desk review; develop the inception report, including sample size and sampling technique; draft and finalize the inception report and evaluation methodology, incorporating relevant comments, in line with the guidelines and template on the IEU website http://www.unodc.org/unodc/en/evaluation/evaluation-step-by-step.html; lead and coordinate the evaluation process and oversee the tasks of the national evaluator; implement quantitative tools and analyze data; triangulate data and test rival explanations; ensure that all aspects of the terms of reference are fulfilled; draft an evaluation report in line with UNODC evaluation policy and the guidelines and template on the IEU website http://www.unodc.org/unodc/en/evaluation/evaluation-step-by-step.html; finalize the inception report and evaluation report on the basis of corrections and comments received; and present key evaluation findings, and final evaluation report to stakeholders.

More details are provided in the respective job descriptions in Annex I.

Role of the International and National Anti-Corruption Experts

The International and National Anti-Corruption Experts are expected to: assist the Team Leader in all stages of the evaluation process, as per the respective TOR; participate in selected missions; provide substantive guidance on corruption issues and anti-corruption initiatives in Nigeria throughout the evaluation process; and deliver technical inputs related to anti-corruption on the inception report and evaluation reports.

More details will be provided in the respective job descriptions in Annex I.

Absence of Conflict of Interest

UNODC rules stipulate that any of the experts composing the Evaluation Team must not have been involved in the design and/or implementation, supervision and coordination of and/or have benefited from the project under evaluation.

Reference to the Evaluators' ToR detailing Qualifications and Responsibilities

Please refer to Annex I for details of the Evaluators' ToR.

IX.   MANAGEMENT OF THE EVALUATION PROCESS

Roles and Responsibilities of the Project Coordinator

The Project Coordinator will be the Evaluation Manager and will take an overall leading role in the management of the evaluation process, finalizing the ToR (upon clearance by the IEU), organizing the Core Learning Partners and informing them of their role, recruiting evaluators (upon clearance by IEU), providing desk review materials to the evaluation team, reviewing the inception report as well as the evaluation methodology for factual errors, assuring the availability of the evaluation budget and all logistical requirements (e.g. payments, arranging of travel, scheduling of meetings, transportation, independent interpretation etc.), liaising with UNODC Headquarters, the Core Learning Partners and the members of the Core Learning Partners and the Project Management Committee, reviewing the draft report for factual errors as well as developing a management response to the evaluation recommendations, as well as follow-up actions (to be updated once per year). Finally, project management is also responsible for the dissemination of the finale valuation report as well as the facilitation of the presentation of the evaluation findings.

Roles and Responsibilities of the M&E Officer

The M&E Officer shall have a supportive role in the final evaluation in terms of drafting the ToR and the evaluation work plan, coordinating with the IEU, liaising with the Programme Support Team and other relevant staff at the country office, advising the Project Coordinator on all matters related to the final evaluation, and presenting the final evaluation work plan and ToR in the project governance structures (i.e. trilateral meetings with the EU and MBNP, and Focal Points Meetings).

Roles and Responsibilities of the Core Learning Partners

Under the guidance of the Project Coordinator who will act as the overall Evaluation Manager, the Core Learning Partners will serve as the mechanism for representation and participation of the various project stakeholders in the final evaluation process. This group also includes the desk officers from the donor agency (EU) and the principal counterpart agency from the Government of Nigeria (i.e. Ministry of Budget and National Planning). UNODC and UNDP will also be represented in the Core Learning Partners.

The Core Learning Partners will provide inputs to the evaluation work plan and TOR, attend the presentations by the Evaluation Team, and make corrections and comments on the draft evaluation report and participate in the presentation of the final evaluation results.

Roles and Responsibilities of the Project Management Committee

The Project Management Committee (PMC) is the highest governance body for the "Support to Anti-Corruption in Nigeria" Project (NGAX60). It is comprised by officials from the anti-corruption agencies, a CSO representative, EU, MBNP and UNODC. This committee deliberates on and approves the project work plans and the progress reports. The PMC shall be convened per schedule in July 2017 for the presentation of the final evaluation report, as part of the meeting agenda.

Roles and Responsibilities of the Independent Evaluation Unit

The Independent Evaluation Unit (IEU) provides mandatory normative tools, guidelines and templates to be used in the evaluation process. Please find the respective tools on the IEU web site http://www.unodc.org/unodc/en/evaluation/evaluation.html. Furthermore, IEU provides guidance, evaluation expertise and quality assurance throughout the evaluation process.

IEU reviews and clears all deliverables of this evaluation – Terms of Reference; Selection of Evaluators; Inception Report; Draft Evaluation Report; Final Evaluation Report; Management Response/Evaluation Follow-up Plan.

Logistical Support Responsibilities

The Project Coordinator will be responsible for the provision of logistical support to the Evaluation Team, including arranging their field missions, their transportation requirements within Abuja and Nigeria, and coordination/scheduling of interviews, survey/s, and meetings with the project stakeholders.

X.   PAYMENT MODALITIES

The selected evaluators will hold the position of UNODC Consultants. As such, they will be issued consultancy contracts and paid in accordance with UNODC rules and regulations. The contract is a legally binding document in which the consultant agrees to complete the deliverables by the set deadlines. Payment of professional fees is correlated to deliverables and three instalments are typically foreseen:

•   The first payment upon clearance of the Inception Report (in line with UNODC evaluation guidelines, templates, handbook, norms and standards) by IEU and acceptance by UNODC CONIG;

•   The second payment upon clearance of the Draft Evaluation Report (in line with UNODC evaluation guidelines, templates, handbook, norms and standards) by IEU and acceptance by UNODC CONIG;

- The third and final payment (i.e. the remainder of the fee) only after completion of the respective tasks, receipt of the final report (in line with UNODC evaluation guidelines, templates, handbook, norms and standards) and clearance by IEU and acceptance by UNODC CONIG, as well as presentation of final evaluation findings and recommendations.

Consultants will be entitled to daily subsistence allowances to cover their stay while in Nigeria, as per UNODC rules and regulations. 75 percent of the daily subsistence allowance and terminals is paid in advance, before travelling. The balance is paid after the travel has taken place, upon presentation of boarding passes and the completed travel claim forms.

ANNEX II. EVALUATION TOOLS: QUESTIONNAIRES AND INTERVIEW GUIDES

The evaluation did not include a survey or formal questionnaire. The table below summarises the questions raised by the evaluators in the context of semi-structured interviewed and focus group discussions. The questions were formulated so as to help address each of the judgement criteria listed in the Evaluation Matrix (see Introduction).

Most interviews and discussions involved only a relatively small sub-set of the questions listed in the table.

Were you (was your organisation) involved in discussion of the project prior to design being finalised?   Did the project design take into account Nigeria's policies at the time of its design, as well as Nigeria's commitments under UNCAC?   Did the project design take into account a consideration of the situation and needs of CSOs dealing with anti-corruption?
Was the project strategy based on a sound analysis of the political and socio-economic strengths and weaknesses of the national and state governments, and of the ACAs?   Did the project strategy take into account the institutional development, mandate and capacities of the ACAs, as well as their needs in terms of capacity building, organisational development and mandate?   Did the project strategy take into account the institutional development, legal environment and capacity of the CSOs that were likely to receive grants under the project, as well as their needs in terms of capacity building and advocacy?
Was the project designed to help upgrade the competence of the anti-corruption bodies and to support prosecutions, in accordance with the provisions of the EU's National Indicative Programme for Nigeria, 2008-2013?   Was the project also designed to support advocacy by ACAs and CSOs, in accordance with the provisions of the EU's National Indicative Programme for Nigeria, 2008-2013)?   Was the project strategy consistent with the intervention framework and performance indicators of the EU's National Indicative Programme for Nigeria, 2008-2013?
Were the project strategy and design consistent with the UNDAF priorities, which addressed anti-corruption as part of improving governance within the Public Service and as a cross-cutting issue and in terms of CSO capacity?   Were the project strategy and design consistent with the UNODC regional programme 2010-14, which addressed anti-corruption at national and regional levels?

Did the project help strengthen anti-corruption policy-making, coordination, research, monitoring and legislation, in line with UNCAC?

Did the project help enhance institutional and operational capacity of anti-corruption agencies, and improve inter-agency cooperation?

Did the project help ensure that CSOs were empowered to increase the provision of services and their participation in anti-corruption activities?

Were the organisation and implementation of project activities such that the achievement of all three outcomes amounted to tangible support to the Nigerian Government in preventing and fighting corruption? |
| Is there evidence of enhanced inter-agency coordination, improved research capacity, and strengthened legal drafting among Nigerian ACAs?

Is there evidence of improved institutional development strategies, enhanced corruption prevention capabilities, law enforcement and intelligence/investigation capabilities, and public awareness raising capacity, among ACAs (outcome 2)?

Is there evidence of effective project planning in relation to the CSO empowerment component of the project, of strengthened CSO capabilities, of a functional grant scheme, and of enhanced CSO networking and advocacy in relation to the fight against corruption (outcome 3)?

Did the project, as implemented, help beneficiaries and target groups to address their needs in relation to the fight against corruption, and help ensure that end-users (institutions, CSOs and ultimately private citizens) were better able to exercise their rights in relation to transparency and accountability? |
| Did the visibility activities highlight the aims and achievement of the project, the contribution of the EU, the contribution of the ACAs to the fight against corruption, including through the output of ACAs and including through the use of a visual identity for the project?

Did the visibility activities address all the target groups listed in the visibility strategy: ACAs (primary target group); Government, media, donors and others (secondary target group); and the population at large (tertiary target group), with messages that were relevant to each group? |
| Did the project undergo a step change in terms of effectiveness as a result of the implementation of the recommendations of the mid-term evaluation?

Was the project's effectiveness enhanced (especially after the MTE) by a sound intervention logic, underpinned by appropriate performance indicators?

Was the project's effectiveness underpinned in part by a sound political economy analysis and by an appropriate analysis of risks and mitigation strategies? |
| Taking into account its activities, outcomes and impact, did the project represent good value for money, in keeping with similar UN-implemented projects?

Did the project made good use of the expertise available to UNODC, particularly with regard to research, and took into account lessons learned and good practices developed by other UNODC projects in similar domains? |
| Was the project team able to manage the project in such a way as to ensure the timely delivery of planned outputs and activities, particularly since 2015?

Did institutional arrangements help ensure that project management mechanisms put in place by UNODC were appropriate to deliver management that was timely, flexible and accountable? |
| Was the budget designed and implemented in a way that enabled it to meet its objectives? |

Was there was a reasonable relationship between project inputs and outputs? Did institutional arrangements promote effective project management and accountability, including through appropriate monitoring and evaluation processes?
Did the project activities and outputs improve policy-making and monitoring in relation to anti-corruption efforts in Nigeria? Did the project activities and outputs enhance coordination among ACAs at working/expert level? Did the project activities and outputs enhance the participation of CSOs in policy and political debates on the fight against corruption, as well as the visibility of their advocacy?
Has the project contributed to changes in the approach that the Government, ACAs and CSOs take to the fight against corruption? Did the project contribute in a tangible manner to a greater understanding of corruption among the target institutions and CSOs, including relevant staff members and managers?
Did the project contribute to changed attitudes on the fight against corruption on the part of civil servants, staff and managers of ACAs and CSOs, including with regards to the important of conducting impartial research and developing effective advocacy approaches? Did the project contribute to changing public attitudes about corruption among the wider public in Nigeria, especially among people targeted by media campaigns, ACA and CSO public activities?
Did the project design include an exit strategy that identifies processes and approaches to foster a continued impetus towards broadening the fight against corruption? Are the stakeholders in the project, including the ACAs and CSOs, willing and able to follow up on project activities, where applicable?
Are the policies, methodologies and political approaches developed during the project period likely to be continued beyond the end of the project? Did the training, mentoring and other capacity building activities help ensure that the ACAs maintain and develop their activities and continue to enhance coordination and cooperation with each other? Did the CSO-related activities help CSO to establish organisational processes, acquire anti-corruption skills (research, campaigning, advocacy) and coordination mechanisms that are likely to be used beyond the project funding period?
To what extent was UNODC able to take advantage of its unique position and comparative advantage to achieve results that could not have been achieved had support come from other donors? Was UNODC able to achieve results that alternative implementers would have found more difficult to achieve? Did the project design made good use of UNODC's status as an international, impartial actor?

ANNEX III.   DESK REVIEW LIST

Project documents (116 documents)

Description of the Action

X60 Project Activity per ACA

Household Survey

CASAN Project evaluation PowerPoint Presentation

Project Budget

Correspondence between UNODC and EUD, MNBP – 17 documents

Annual Reports (narrative and financial, EU and UNODC formats) – 27 documents

PMC meeting notes – 14 documents

MTE and Management Response – 4 documents

Visibility Guidelines and Strategy – 4 documents

Focal Points meeting notes – 33 documents

ACA Chief Executives meeting notes – 4 documents

Project formulation and EU financing agreement – 3 documents

Annual Work Plans – 9 documents

Other documentation (4 documents)

UNEG Handbook for Conducting Evaluations of Normative Work

UNODC Regional Programmes West Africa 2010-2014, 2016-2020

UNDP Nigeria UNDAF II 2009; UNDAF III 2014-2017

EU Country Strategy Paper & National Indicative Programme 2008-2013

Total number of documents consulted: 120

ANNEX IV.   LIST OF PERSONS CONTACTED DURING THE EVALUATION

Number of interviewees	Organisation	Sex disaggregated data	Country
25	UNODC	Male: 11 Female: 14	Nigeria and HQ
1	NHRC	Male: 1	Nigeria
85	ACAs	Male: 56 Female: 29	Nigeria
1	EU Delegation	Female: 1	Nigeria
2	MNBP	Male: 1 Female: 1	Nigeria
2	NBS	Male: 2	Nigeria
5	UNDP	Male: 2 Female: 3	Nigeria
2	FCT-HC	Male: 1 Female: 1	Nigeria
4	FHC	Male: 2 Female: 2	Nigeria
1	British Council	Male: 1	Nigeria
11	CSOs	Male: 7 Female: 4	Nigeria
7	Non-Affiliated (consultants, etc.)	Male: 6 Female: 1	Nigeria and various (phone interviews)
Total: 146		Male: 90 Female: 56	

ANNEX V. EVALUATION MATRIX

Evaluation Questions and Criteria	Judgement Criteria (Outcomes addressed)	Sources of evidence
Relevance		
EQ1. To what extent was the project aligned with the needs, plans and priorities of the Government of Nigeria (e.g. the UNCAC) as a whole?	JC1.1 The project was discussed with relevant stakeholders prior to design being finalised (all outcomes) JC1.2 The project design took into account, explicitly or implicitly, Nigeria's policies at the time of its design, as well as Nigeria's commitments under UNCAC (outcomes 1 and 2). JC1.3 The project design took into account, explicitly or implicitly, a consideration of the situation and needs of CSOs dealing with anti-corruption (outcome 3).	• Project proposal, identification report and grant agreement. • Project documentation (annual reports, etc.) • EU National and Regional Indicative Programmes for the 10th FED period. • UNDAF II and III. • UNODC Regional programme 2010-14 (and 2016-20 where relevant). • Other project-related documentation (management committee meeting notes, etc.) • Publications by ACAs, CSOs, other stakeholders. • Research on corruption in Nigeria by relevant international NGOs (Transparency International,
EQ2. To what extent did the project match the needs of the anti-corruption agencies and the CSOs that are part of the anti-corruption effort in Nigeria?	JC2.1 The project strategy was based on a sound analysis of the political and socio-economic strengths and weaknesses of the national and state governments, and of the ACAs (outcome 1). JC2.2 The project strategy took into account the institutional development, mandate and capacities of the ACAs, as well as their needs in terms of capacity building, organisational development and mandate (outcome 2). JC2.3 The project strategy took into account the institutional development, legal environment and capacity of the CSOs that were likely to receive grants under the project, as well as their needs in terms of capacity building and advocacy (outcome 3).	
EQ3. To what extent did the project correspond to the development objectives stated in the 10th EDF?	JC3.1 The project was designed to help upgrade the competence of the anti-corruption bodies and to support prosecutions, in accordance with the provisions of the EU's National Indicative Programme for Nigeria, 2008-2013 (outcomes 1 and 2). JC3.2 The project was also designed to support advocacy by ACAs and CSOs, in accordance with the provisions of the EU's National Indicative Programme for Nigeria, 2008-2013 (outcomes 2 and 3). JC3.3 The project strategy was consistent with the intervention framework and performance indicators of the EU's National Indicative Programme for Nigeria, 2008-2013 (all outcomes).	

EQ4. To what extent did the project contribute to the UNDAF in Nigeria, the regional programmes of UNODC in West Africa, as well as the thematic programme on corruption, economic fraud and identity-related crime?	JC4.1 The project strategy and design were consistent with the UNDAF II and III priorities, which addressed anti-corruption as part of improving governance within the Public Service (outcomes 1 and 2), as a cross-cutting issue (all outcomes) and in terms of CSO capacity (outcome 3). JC4.2 The project strategy and design were consistent with the UNODC regional programme 2010-14, which addressed anti-corruption at national and regional levels (all outcomes).	Global Witness, etc.) • Research reports by Nigerian NGOs. • Interviews with representatives of ACAs, government officials, parliamentarians, NGO representatives, donor government representatives, etc. • Interviews with UNODC project team, UNDP staff, other UN organisations' representatives.
	Effectiveness	
EQ5. To what extent are the project objective and outcomes being achieved?	JC5.1 The project helped strengthen anti-corruption policy-making, coordination, research, monitoring and legislation, in line with UNCAC (outcome 1). JC5.2 The project helped enhance institutional and operational capacity of anti-corruption agencies, and improve inter-agency cooperation (outcome 2). JC5.3 The project helped ensure that CSOs were empowered to increase the provision of services and their participation in anti-corruption activities (outcome 3). JC5.4 The organisation and implementation of project activities was such that the achievement of all three outcomes amounted to tangible support to the Nigerian Government in preventing and fighting corruption (all outcomes).	*Sources as above.*
EQ6. To what extent are the project outputs and activities being delivered, and to what extent are the project outputs and activities useful to beneficiaries and end-users?	JC6.1 There is evidence of enhanced inter-agency coordination, improved research capacity, and strengthened legal drafting among Nigerian ACAs (outcome 1). JC6.2 There is evidence of improved institutional development strategies, enhanced corruption prevention capabilities, law enforcement and intelligence/investigation capabilities, and public awareness raising capacity, among ACAs (outcome 2). JC6.3 There is evidence of effective project planning in relation to the CSO empowerment component of the	

	project, of strengthened CSO capabilities, of a functional grant scheme, and of enhanced CSO networking and advocacy in relation to the fight against corruption (outcome 3). JC6.4 The project, as implemented, helped beneficiaries and target groups to address their needs in relation to the fight against corruption, and helped ensure that end-users (institutions, CSOs and ultimately private citizens) were better able to exercise their rights in relation to transparency and accountability (all outcomes).	
EQ7. How effective are the implementation and visibility strategies as envisioned in the project document and as implemented by the project?	JC7.1 The visibility activities highlighted the aims and achievement of the project, the contribution of the EU, the contribution of the ACAs to the fight against corruption, including through the output of ACAs and including through the use of a visual identity for the project (all outcomes). JC7.2 The visibility activities addressed all the target groups listed in the visibility strategy: ACAs (primary target group); Government, media, donors and others (secondary target group); and the population at large (tertiary target group), with messages that were relevant to each group (all outcomes).	
EQ8. What factors are affecting the overall effectiveness of the project?	JC8.1 The project underwent a step change in terms of effectiveness as a result of the implementation of the recommendations of the mid-term review (all outcomes). JC8.2 The project's effectiveness was enhanced (especially after the MTR) by a sound intervention logic, underpinned by appropriate performance indicators (all outcomes). JC8.3 The project's effectiveness was underpinned in part by a sound political economy analysis and by an appropriate analysis of risks and mitigation strategies (all outcomes) (See also above, JCs 5.4 and 6.4)	
	Efficiency	

EQ9. To what extent were the activities implemented and outputs delivered as planned?	(See EQs on effectiveness.)	*Sources as above.*
EQ10. To what extent were available knowledge, material, technological and financial inputs utilized to achieve the project purposes?	(All outcomes) JC10.1 Taking into account its activities, outcomes and impact, the project represented good value for money, in keeping with similar UN-implemented projects. JC10.2 The project made good use of the expertise available to UNODC, particularly with regard to research, and took into account lessons learned and good practices developed by other UNODC projects in similar domains.	
EQ11. To what extent did the governance and management mechanisms function to make relevant and timely decisions related to the achievement of the project objective?	(All outcomes) JC11.1 The project team was able to manage the project in such a way as to ensure the timely delivery of planned outputs and activities, particularly since 2015. JC11.2 Institutional arrangements helped ensure that project management mechanisms put in place by UNODC were appropriate to deliver management that was timely, flexible and accountable.	
EQ12. What factors affected the overall efficiency of the project?	(All outcomes) JC12.1 The budget was design and implemented in a way that enabled the project to meet its objectives. JC12.2 There was a reasonable relationship between project inputs and outputs. JC12.3 Institutional arrangements promoted effective project management and accountability, including through appropriate monitoring and evaluation processes.	
	Impact	
EQ13. What are the immediate effects, if any, of the project outputs (i.e. policies and coordination mechanisms) on the anti-corruption efforts in Nigeria?	JC13.1 The project activities and outputs have improved policy-making and monitoring in relation to anti-corruption efforts in Nigeria (outcome 1). JC13.2 The project activities and outputs have enhanced coordination among ACAs at working/expert level (outcome 2). JC13.3 The project activities and outputs have enhanced the participation of CSOs in policy and political debates on the fight against corruption, as well as the visibility of their advocacy (outcome 3).	*Sources as above.*

EQ14. To what extent have the capacity-building activities created an "impact" on the beneficiaries (i.e. institutions and persons)?	JC14.1 The project has contributed to changes in the approach that the Government, ACAs and CSOs take to the fight against corruption (all outcomes). JC14.2 The project contributed in a tangible manner to a greater understanding of corruption among the target institutions and CSOs, including relevant staff members and managers (all outcomes).	
EQ15. To what extent has the project created a pioneering or innovative approach towards anti-corruption in Nigeria that can be regarded as a model for replication in future interventions?	JC15.1 The project contributed to changed attitudes on the fight against corruption on the part of civil servants, staff and managers of ACAs and CSOs, including with regards to the important of conducting impartial research and developing effective advocacy approaches (all outcomes). JC15.2 The project contributed to changing public attitudes about corruption among the wider public in Nigeria, especially among people targeted by media campaigns, ACA and CSO public activities (all outcomes).	
EQ16. What factors are affecting the "impact" of the project or its potential?	This EQ should be addressed in the conclusions section of the report, based on the responses to the above EQs.	
Sustainability		
EQ17. What sustainability strategies were envisioned for the project and to what extent were these adopted?	(All outcomes) JC17.1 The project design included an exit strategy that identified processes and approaches to foster a continued impetus towards broadening the fight against corruption. JC17.2 The stakeholders in the project, including the ACAs and CSOs, are willing and able to follow up on project activities, where applicable.	*Sources as above.*
EQ18. To what extent are the project activities and outputs expected to continue and be utilized beyond the life of the project?	JC18.1 The policies, methodologies and political approaches developed during the project period are likely to be continued beyond the end of the project (outcome 1). JC18.2 The training, mentoring and other capacity building activities are helping to ensure that the ACAs maintain and develop their activities and continue to enhance coordination and cooperation with each other (outcome 2). JC18.3 The CSO-related activities are helping CSO to establish organisational processes and acquire anti-corruption skills (research, campaigning, advocacy) and coordination mechanisms that are likely to be used beyond the project funding period (outcome 3).	

EQ19. What factors are affecting the sustainability of the intervention?	This EQ should be addressed in the conclusions section of the report, based on the responses to the above EQs.	
	Partnerships and Cooperation	
EQ20. To what extent were the partnership and cooperation agreements established through the project relevant for the achievement of the project objective?	The partnerships aspects will be considered as part of the relevance, effectiveness and sustainability discussion, based on the above EQs.

Specific consideration will be given to the **added value** of UNODC (and UNDP in the case of outcome 3) as project implementer.

The questions may be formulated as follows:
• To what extent was UNODC able to take advantage of its unique position and comparative advantage to achieve results that could not have been achieved had support come from other donors?

JCs might include:
• UNODC was able to achieve results that alternative implementers would have found more difficult to achieve.
• The project design made good use of UNODC's status as an international, impartial actor. | *Sources as above.* |
EQ21. To what extent were the partnership agreements created by the project aligned with the sustainability strategy of the intervention?		
EQ22. What factors affected the effectiveness, efficiency and sustainability of the partnership and cooperation initiatives of the project?		
	Human Rights and Gender Equality/Women's Empowerment	
EQ23. To what extent was the theme of human rights analysed and considered in the project design?	To be addressed as part of the consideration of relevance (EQ2 in particular).	*Sources as above.*
EQ24. To what extent was the aspect of human rights addressed through the project activities?	To be addressed as part of the consideration of effectiveness (EQs 5 and 6 in particular).	
EQ25. To what extent was the aspect of women's empowerment/gender equality considered in the project design?	To be addressed as part of the consideration of relevance (EQ2 in particular).	
EQ26. To what extent was the aspect of women's empowerment/gender equality addressed through the project activities?	To be addressed as part of the consideration of effectiveness (EQs 5 and 6 in particular).	
EQ27. What factors affected the effectiveness of the project in mainstreaming and addressing the issues of	To be addressed as part of the consideration of effectiveness (EQ8 in particular).	

human rights and women's empowerment/gender equality?		
Lessons Learned and Best Practices		
EQ28. What best practices on anti-corruption legislation, capacity-building, and inter-agency coordination can be drawn from the project experience?	These EQs will be answered on the basis of evidence obtained through the consideration of the above evaluation criteria.	
EQ29. Are there key lessons on the capacity-building approaches (i.e. training, mentoring, input provision) followed by the project that should be considered for future programming?		
EQ30. Are there key lessons on the mainstreaming of CSOs in the anti-corruption efforts in Nigeria?		
EQ31. What key lessons on partnerships in the context of an anti-corruption programme in Nigeria should be considered in a future project design?		
EQ32. What key lessons on the mainstreaming of human rights in the context of an anti-corruption programme in Nigeria should be considered in a future project design?		
EQ33. What key lessons on the mainstreaming of women's empowerment/gender equality in the context of an anti-corruption programme in Nigeria should be considered in a future project design?		